



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

OCT 16 2014

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7677 8510
RETURN RECEIPT REQUESTED

Ms. Marijan Grogza
Safety and Security Manager
Jay Plastics, Inc.
150 East Longview Avenue
Mansfield, Ohio 44903

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
Jay Plastics, Inc.
EPA I.D. No.: OHD000817858

Dear Ms. Grogza:

On July 10, 2014, representatives of the U.S. Environmental Protection Agency and the Ohio Environmental Protection Agency (Ohio EPA) inspected Jay Plastics, Inc. (Jay Plastics), located at 150 East Longview Avenue, in Mansfield, Ohio. The purpose of the inspection was to evaluate Jay Plastics' compliance with certain requirements of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment, and storage of hazardous waste by a large quantity generator of such wastes. Please find an enclosed copy of EPA's inspection report and checklists for your reference.

Based on information provided by Jay Plastics' personnel, a review of records and personal observations by the inspectors, EPA finds that Jay Plastics is engaged in the management of hazardous waste without a hazardous waste storage permit, and is in violation of certain requirements of the United States Code of Federal Regulations (C.F.R.) and the Ohio Administrative Code (OAC). To be eligible for the exemption from the requirement to obtain a hazardous waste storage permit, Jay Plastics must be in compliance with the conditions of OAC 3745-52-34(A), (B), and (C) [40 C.F.R. § 262.34(a), (b), and (c)]. Specifically, we find that Jay Plastics is in noncompliance with the following conditions for a storage permit exemption, and in violation of the following requirements:

1. A generator must keep records of any test results, waste analyses, or other determinations made in accordance with rule 3745-52-11 of the Administrative Code for at least three years from the date that the waste was last sent to on-site or off-site treatment, storage, or disposal. See, OAC 3745-52-40(C) [40 C.F.R. § 262.40(c)].

During the inspection of records, there was no documented waste determination provided for the following wastes: Kolene molten salt/sludge (disposed of at Crawford County Landfill), and the grease sludge from the sewer interceptor (near Engineering Bay). Jay Plastics, therefore, violated the above-referenced generator waste determination and documentation requirement. However, Jay Plastics submitted correspondence dated August 3, 2014, which indicated that a documented waste determination had been obtained for both of the above-referenced wastes. Thus, no further actions are necessary to comply with these requirements.

2. In order to avoid the need for a hazardous waste storage permit, a generator must ensure that the date upon which each period of accumulation and/or treatment begins is clearly marked and visible for inspection on each container. See, OAC 3745-52-34(A)(2) [40 C.F.R. § 262.34(a)(2)].

During the inspection of the Paint Storage area (Hazardous Waste Storage area), the inspectors observed that there were eight 55-gallon drums stacked two high on pallets. The labels on all eight drums were not visible. Mr. Olivieri utilized a fork truck to bring down the top row of drums for inspection. Six of the eight drums were dated within ninety days of the date of this inspection with the oldest date being 6/23/14. The other two drums were not marked with accumulation start dates. Mr. Olivieri and Ms. Grogosza both stated that the accumulation start period for both drums was the end of June 2014. Jay Plastics, therefore, failed to comply with the above-referenced condition for a permit exemption.

3. In order to avoid the need for a hazardous waste storage permit, a generator must ensure that a container holding hazardous waste always be closed during storage, except when it is necessary to add or remove waste. See, OAC 3745-52-34(A)(1)(a) [40 C.F.R. § 262.34(a)(1)(i)]; OAC 3745-66-73(A) [40 C.F.R. § 265.173(a)]. This is also a requirement on owners and operators of hazardous waste storage facilities under OAC 3745-55-73(A) [40 C.F.R. § 264.173(a)].

Also, in order to avoid the need for a hazardous waste storage permit, a large quantity generator that is managing hazardous waste in a container using Container Level 1 controls shall install all covers and closure devices for the container. See, 40 CFR § 262.34(a)(1)(i). This is also a requirement of owners and operators of hazardous waste storage facilities, under 40 CFR 265.1087(c)(3).

During the inspection of the South Side of the Paint Storage area (Hazardous Waste Storage Area), the inspectors observed that there were four 55-gallon drums. All four drums were dated within ninety days of the date of this inspection with the oldest date being 6/27/14. All four drums were labeled as "Hazardous Waste." Three of the four

drums were closed. One of the drums dated 7/9/14, was open. No waste was being added to or removed from the container at the time of inspection. The hazardous waste in the drum had an average volatile organic concentration of greater than 500 parts per million (ppm) at the point of waste origination as based on the generator's knowledge. Jay Plastics, therefore, failed to comply with the above-referenced conditions for a permit exemption and violated the above-referenced storage facility use and management of containers requirements.

4. In order to avoid the need for a hazardous waste storage permit, a generator may accumulate as much as fifty-five gallons of hazardous waste or one quart of acutely hazardous waste listed in paragraph (E) of rule 3745-51-33 of OAC in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit and without complying with paragraph (A) of this rule provided he: (a) Complies with rules 3745-66-71, 3745-66-72, and paragraph (A) of rule 3745-66-73 of the Administrative Code. Specifically, a container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove waste. See, OAC 3745-52-34(C)(1)(a) [40 C.F.R. § 262.34(c)(1)(i)].

During the inspection of the E-Bright 1 area, the inspectors observed that there was one SAA that consisted of one 55-gallon drum that contained waste paint as stated by Mr. Olivieri. The drum was labeled as "Hazardous Waste", and was open. There was no waste being added or removed at the time of the inspection. Jay Plastics, therefore, failed to comply with the above-referenced condition for a permit exemption.

Also, during the inspection of the Back Garage area, the inspectors observed that there was one SAA (for the Top Coat process) that consisted of one 55-gallon drum that contained waste paint and solvent as stated by Mr. Olivieri and Ms. Grogosza. The drum was labeled as "Hazardous Waste", and was open. There was no waste being added or removed at the time of the inspection. Jay Plastics, therefore, failed to comply with the above-referenced condition for a permit exemption.

5. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must inspect areas where containers are stored, at least weekly, looking for leaks and for deterioration caused by corrosion or other factors. The inspections must be recorded in an inspection log or summary. See, OAC 3745-52-34(A)(1)(a) [40 C.F.R. § 262.34(a)(1)(i)]; OAC 3745-66-74 [40 C.F.R. §§ 265.15(d), 265.174]. This is also a requirement of owners and operators of hazardous waste storage facilities under OAC 3745-54-15(B)(4) and (D) and 3745-55-74 [40 C.F.R. §§ 264.15(b)(4) and (d) and 264.174].

During the inspection of the hazardous waste container weekly inspection records for the Paint Storage Area (Hazardous Waste Storage Area), the following documented periods indicated missed weekly inspections: 12/20/13 to 1/3/14; 11/22/13 to 12/6/13; 6/27/13 to 7/11/13; 3/28/13 to 4/11/13; and 3/7/12 to 3/21/12. Jay Plastics, therefore, failed to comply with the above-referenced condition for a permit exemption and violated the

above-referenced storage facility weekly hazardous waste container inspection and documentation requirement.

6. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions, and ensure that the training is documented, along with all RCRA training requirements. See, OAC 3745-52-34(A)(4) [40 C.F.R. § 262.34(a)(4)]; OAC 3745-65-16(A)-(E) [40 C.F.R. § 265.16(a)-(e)]. These are also requirements of owners and operators of hazardous waste storage facilities under OAC 3745-64-16(A)-(E) [40 C.F.R. § 264.16(a)-(e)].

During the inspection of records, there was not a RCRA hazardous waste management training program in place at the facility at the time of the inspection as Ms. Grogoza stated that no RCRA training documentation was found at the time of the inspection. The annual RCRA training curriculum and the sign-in sheets that documented if any RCRA trainings were received, were not provided. Jay Plastics submitted correspondence dated August 3, 2014, which indicated that the last date of documented training at the facility was in 2008. Jay Plastics, therefore, failed to comply with the above-referenced conditions for a permit exemption and violated the above-referenced storage facility hazardous waste management procedures training program and documentation requirements. However, Jay Plastics submitted correspondence dated August 3, 2014 and September 10, 2014, which indicated that RCRA training had been given to all employees who are in hazardous waste management positions at the facility. Thus, no further actions are necessary to comply with these conditions/requirements.

7. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must maintain the following documents and records at the facility: job titles for each position at the facility related to hazardous waste management, and the name of the employee filling each job; written job descriptions for each hazardous waste management position that must include the requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position; and the type and amount of both introductory and continuing training to be given to each employee filling a hazardous waste management position. See, OAC 3745-52-34(A)(4) [40 C.F.R. § 262.34(a)(4)]; OAC 3745-65-16(D)(1)-(3) [40 C.F.R. § 265.16(d)(1)-(3)]. This is also a requirement of owners and operators of hazardous waste storage facilities under OAC 3745-54-16(D)(1)-(3) [40 C.F.R. § 264.16(d)(1)-(3)].

During the inspection of records, there were no records provided that indicated that the job titles, job descriptions, and type and amount of training needed were documented for the employees in hazardous waste management positions. Jay Plastics, therefore, failed to comply with the above-referenced conditions for a permit exemption and violated the above-referenced storage facility training documents and records requirements. However, Jay Plastics submitted correspondence dated August 3, 2014, which indicated that the above-referenced RCRA training documents and records for the hazardous waste

management positions at the facility had been completed. Thus, no further actions are necessary to comply with these conditions/requirements.

8. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste, and must include all of the contingency plan requirements. See, OAC 3745-52-34(A)(4) [40 C.F.R. § 262.34(a)(4)]; OAC 3745-65-50 through 54 [40 C.F.R. §§ 265.50 through 54]. This is also a requirement of owners and operators of hazardous waste storage facilities under OAC 3745-54-50 through 54 [40 C.F.R. §§ 264.50 through 54].

During the inspection of records, the review of the contingency plan indicated that the facility's plan was incomplete as it did not document any of the required information. Jay Plastics, therefore, failed to comply with the above-referenced conditions for a permit exemption and violated the above-referenced storage facility contingency plan requirements.

9. In order to avoid the need for a hazardous waste storage permit, a large quantity generator must ensure that all facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment, where required, must be tested and maintained as necessary to assure its proper operation in time of emergency. The owner or operator must record the inspections in a log or summary. See, OAC 3745-52-34(A)(4) [40 C.F.R. § 262.34(a)(4)]; OAC 3745-65-33 [40 C.F.R. § 265.33]. This is also a requirement of owners and operators of hazardous waste storage facilities under OAC 3745-54-33 [40 C.F.R. § 264.33].

During the inspection of records, the review of the emergency equipment inspections indicated that only one of several (approximately 10) eye wash stations was documented as being inspected as stated by Mr. Olivieri and Ms. Groggoza. All eye wash stations are inspected as stated by Mr. Olivieri and Ms. Groggoza. Jay Plastics, therefore, failed to comply with the above-referenced condition for a permit exemption and violated the above-referenced storage facility emergency equipment inspection and documentation requirements.

10. Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil." See, OAC 3745-279-22(C)(1) [40 C.F.R. § 279.22(c)(1)].

During the inspection of the Maintenance Lean Tube area, the inspectors observed that there were two 55-gallon drums that contained used oil as stated by Mr. Olivieri and Ms. Groggoza. One of the drums (one with the red pump in it) was labeled as "Waste Oil", and was open. The other drum was not labeled. There was one 330-gallon tote that contained used oil as stated by Mr. Fitzgerald. The tote was not labeled and was open. There was one 55-gallon drum that contained used oil as stated by Mr. Fitzgerald. The drum was not labeled. There was one 330-gallon tote that contained used oil as stated by Mr.

Fitzgerald. The tote was not labeled and was open. Jay Plastics, therefore, violated a used oil requirement.

11. A generator, transporter, processor/re-refiner, or burner who first claims that used oil that is to be burned for energy recovery meets the specifications for used oil fuel under rule 3745-279-11 of the Administrative Code shall keep copies of analyses of the used oil (or other information used to make the determination) for three years. See, OAC 3745-279-72(B) [40 C.F.R. § 279.72(b)].

During the opening conference of the inspection, Mr. Taylor stated that Jay Plastics generates used hydraulic oil, from process equipment, that is picked up by Adena Corporation General Contractors (Adena) in Mansfield, Ohio, and burned in an Adena space heater on Adena's property. Adena picks up five to six 300-gallon totes from Jay Plastics per year for burning as stated by Mr. Taylor. Also, during the inspection of the Maintenance Lean Tube area, Mr. Fitzgerald also stated that the facility's used oil is picked up by Adena for burning.

During the inspection of records, there was no documentation provided that indicated that the used oil being picked up and burned on Adena's property met the specifications for used oil fuel. Jay Plastics, therefore, violated a used oil requirement. However, Jay Plastics submitted correspondence dated August 21, 2014, that included documentation that their used oil being burned at Adena met the specifications for used oil fuel. Thus, no further actions are necessary to comply with this requirement.

12. Used oil fuel marketers subject to the requirements of rules 3745-279-70 to 3745-279-75 of the Administrative Code who have not previously notified Ohio EPA or U.S. EPA of regulated waste activity must comply with these requirements and obtain a U.S. EPA identification number. See, OAC 3745-279-73(A) and (B) [40 C.F.R. § 279.73(a) and (b)].

During the inspection of records, there was no documentation provided that indicated that Jay Plastics had notified Ohio EPA of the specific used oil activity. Jay Plastics, therefore, violated used oil requirements. However, Jay Plastics submitted correspondence dated August 3, 2014, that indicated that their used oil is no longer being burned at Adena, and is being picked up by Capital City Oil (Mt. Vernon, Ohio). Thus, no further actions are necessary to comply with these requirements.

13. A generator, transporter, processor/re-refiner, or burner who first claims that used oil that is to be burned for energy recovery meets the fuel specifications under rule 3745-279-11 of the Administrative Code must keep a record of each shipment of used oil to the facility to which it delivers the used oil. Records for each shipment must include the following information: (1) The name and address of the facility receiving the shipment; (2) The quantity of used oil fuel delivered; (3) The date of shipment or delivery; and (4) A cross-reference to the record of used oil analysis or other information used to make the determination that the oil meets the specification as required under paragraph (A) of rule

3745-279-72 of the Administrative Code. The records described must be maintained for at least three years. See, OAC 3745-279-74(B) and (C) [40 C.F.R. § 279.74(b) and (c)].

During the inspection of records, there was no documentation provided that indicated that Jay Plastics was keeping records of these shipments. Jay Plastics, therefore, violated used oil requirements. However, Jay Plastics submitted correspondence dated August 3, 2014, that indicated that their used oil is no longer being burned at Adena, and is being picked up by Capital City Oil (Mt. Vernon, Ohio). Thus, no further actions are necessary to comply with these requirements.

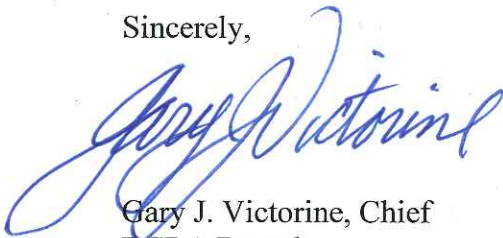
14. A large quantity generator who accumulates hazardous waste on-site for less than 90 days, and who does not meet the conditions for a storage permit exemption of OAC 3745-52-34(A), (B), and (C) [40 C.F.R. § 262.34(a), (b), and (c)], is an operator of a hazardous waste storage facility, and is required to apply for and obtain a hazardous waste storage permit. See, OAC 3745-50-40 to 3745-50-66; 3745-54 to 3745-57; 3745-205 and 3745-256 [40 C.F.R. Part 264, 40 C.F.R. §§ 270.1(c) and 270.10(a) and (d), and 270.13]. On failing to comply with the conditions for a permit exemption referenced in items 2-9 above, Jay Plastics became an operator of a hazardous waste storage facility, and was required to apply for and to obtain a hazardous waste storage permit. Jay Plastics did not apply for, or obtain, a hazardous waste storage permit. Jay Plastics' failure to apply for and to obtain a hazardous waste storage permit violated the permitting requirements of OAC rules 3745-50-41, par. (A); and 3745-50-45, par. (A) [40 C.F.R. §§ 270.1(c), 270.10(a) and (d), and 270.13].

At this time, EPA is not requiring Jay Plastics to apply for a storage permit, so long as it immediately establishes compliance with the conditions for an exemption as outlined above. Under Section 3008(a) of RCRA, 42 U.S.C. § 6928(a), EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a response in writing to this office documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response no later than thirty (30) days after receipt of this letter to Bryan Gangwisch, EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604.

If you have any questions or concerns regarding this letter, please contact Bryan Gangwisch, of my staff, at 312-886-0989.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Brent Goetz, Ohio EPA- NWDO
brent.goetz@epa.ohio.gov

Bruce McCoy, Ohio EPA- CDO
bruce.mccoy@epa.ohio.gov

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA BRANCH, LR-8J
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: Jay Plastics, Inc. (division of Jay Industries, Inc.)

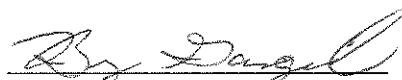
EPA ID No.: OHD000817858

ADDRESS: 150 East Longview Avenue
Mansfield, OH 44903

DATE OF INSPECTION: July 10, 2014

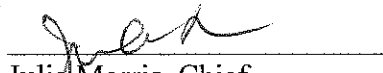
EPA INSPECTOR: Bryan Gangwisch

PREPARED BY:


Bryan Gangwisch
Environmental Scientist
Compliance Section #2

7/29/14
Date Completed

ACCEPTED BY:


Julie Morris, Chief
Compliance Section #2

8/4/14
Date

Purpose of Inspection

This inspection was an evaluation of Jay Plastics, Inc. (Jay Plastics), and its compliance with hazardous waste regulations found at Ohio Administrative Code (OAC) and the Code of Federal Regulations (CFR). I performed the inspection with Brent Goetz of the Ohio Environmental Protection Agency (Ohio EPA). The inspection was a Federal lead RCRA Compliance Evaluation Inspection (CEI).

Participants

Rick Taylor, President	Jay Plastics
Paul Boggs, Vice President	Jay Plastics
Marijan Grogoza, Safety and Security Manager	Jay Plastics
Joseph Olivieri, Environmental Health Manager	Jay Plastics
Bob Fitzgerald, Maintenance Manager	Jay Plastics
Bryan Gangwisch, Environmental Scientist	U.S. EPA
Brent Goetz, Environmental Specialist II	Ohio EPA

Introduction

The inspectors arrived at the site on July 10, 2014, at approximately 9:10 a.m. The weather consisted of sunny conditions with light wind, and an ambient air temperature of approximately 80 degrees Fahrenheit. As Mr. Boggs arrived in the reception area, we introduced ourselves, presented our inspector credentials and identification, and described the purpose of the inspection and the process by which we intended to conduct the inspection. The inspectors were led to a conference room. Mr. Taylor, Mr. Boggs, Ms. Grogoza, and Mr. Olivieri provided us with a verbal description of the site, led the tour throughout the facility, and then attempted to provide us with the records we requested for review.

Site Description

During the opening conference Mr. Taylor, Mr. Boggs, Ms. Grogoza, or Mr. Olivieri stated all of the following unless otherwise noted: The facility originally built in the early 1960s, was operated as a warehouse for Montgomery Ward. Approximately in 1965, the facility's first manufacturing (electroplating-copper, nickel, and chrome) occurred as Taylor Plating. In the mid-1970s to early 1980s, pre-treatment on plastics and electroplating on plated steel and plastic occurred. In June 1995, the facility shutdown the electroplating operations. Then the facility was reconfigured, and started injection molding operations. Jay Plastics manufactures components for the automotive industry (mainly Ford and Honda). The types of components that are manufactured include: interior trim parts, lighting, and reflectors for forward lighting. The processes include: seven vacuum metalizing lines, spray base-coating, ultraviolet curing, and

painting. Five of the seven metalizing lines utilize a basecoat process before aluminum is deposited on the plastic parts. The other two lines deposit aluminum directly on the plastic parts. Aluminum gets deposited on metal parts very infrequently (less than one percent of the time). There are approximately 400 total employees that work three shifts (Monday-Friday with maintenance activities on the weekends).

Jay Plastics was operating as a large quantity generator (LQG) at the time of the inspection according to facility personnel and the facility's waste generation rate. There was one hazardous waste container storage area observed at the facility at the time of the inspection. There were satellite accumulation areas (SAA) observed at the time of the inspection.

The main waste streams that are regularly generated at the facility consist of: spent solvent flammable liquid waste; solvent-based paint waste; spent paint waste with aluminum; waste by-product of bulk molding compound (BMC) material; spent molten sludge/salt (Kolene-molten salt bath technology); paint sludge from water curtain recycle (centrifuge sludge); spent bag filters from paint lines; crushed fluorescent bulb waste; and grease sludge from sewer interceptor. Jay Plastics generates used hydraulic oil, from process equipment, that is picked up by Adena Corporation General Contractors (Adena) in Mansfield, Ohio, and burned in an Adena space heater on Adena's property as stated by Mr. Taylor. Adena picks up five to six 300-gallon totes from Jay Plastics per year for burning as stated by Mr. Taylor. The crushed fluorescent bulb waste is transported to the Crawford County Landfill (non-hazardous waste landfill) in Bucyrus, Ohio. The hazardous waste codes associated with the main hazardous waste types that were generated at the facility consisted of: D001, D035, F003, and F005. There were no hazardous waste totes or tanks present at the facility at the time of the inspection. The spent lead acid batteries are picked up by Milliron for reclaim. The facility generates solvent rags/shop towels that are sent for laundering/return to Aramark. Jay Plastic's generated scrap metal is picked up by Milliron for recycling. The facility's cardboard is also picked up by Milliron for recycling. The facility does not conduct any wastewater treatment activities. However, the facility does discharge industrial wastewater to the City of Mansfield. The sewer discharge is sampled and monitored by the city. The facility also has a Title V air permit with Ohio EPA.

There were two ponds on the facility's property. The first pond, located to the west-southwest of the facility (near the transformer station), was utilized as a storm water pond, and there was no discharge capability to the pond from any facility structures as stated by Mr. Taylor. The other pond, located to the southwest of the facility, was a natural wetlands as stated by Mr. Taylor.

Site Tour

A physical walk-through of the facility was conducted at approximately 10:56 a.m. We started at the Molding area. Plastic waste generated from this area is re-grinded for reuse in the process as stated by Mr. Olivieri. Mr. Olivieri and Ms. Grogosza stated that all of the facility's generated rags, uniforms, and gloves are picked up by Aramark for laundering/return. There were cubic yard boxes that contained re-grinded plastic for reuse in the process as stated by Mr. Olivieri.

Next, we inspected the E-Brite area. This area was where the metalizing or coating process occurred as stated by Mr. Olivieri. There was no waste in this area at the time of the inspection.

At the Maintenance Lean Tube area, there were three 55-gallon drums that contained crushed spent fluorescent bulbs (four and eight foot bulbs) as stated by Mr. Olivieri. The first drum was labeled as "Universal Waste", was dated 2/26/14, and was closed. The second drum was labeled as "Universal Waste", was dated 12/8/13, and was closed. The third drum was labeled as "Universal Waste" and "Crushed Bulbs", was dated 7/1/13, and was closed. Pictures were taken.

Still in the Maintenance Lean Tube area, adjacent to E-Bright areas 1 and 2, there was a Rag Mailbox. The Rag Mailbox was labeled as "Tube Rags Only."

Still in the Maintenance Lean Tube area, there were two 55-gallon drums that contained used oil as stated by Mr. Olivieri and Ms. Groggoza. One of the drums (one with the red pump in it) was labeled as "Waste Oil", and was open. The other drum was not labeled. Pictures were taken. There were several 55-gallon drums and four 330-gallon totes that contained product motor and product hydraulic oils as stated by Mr. Olivieri. There was one 330-gallon tote that contained used oil as stated by Mr. Fitzgerald. The tote was not labeled and was open. Pictures were taken. Mr. Fitzgerald also stated that the facility's used oil is picked up by Adena for burning. There was one 55-gallon drum that contained used oil as stated by Mr. Fitzgerald. The drum was not labeled. A picture was taken. There was one 330-gallon drum that contained used oil as stated by Mr. Fitzgerald. The drum was not labeled and was open. Pictures were taken. There were three 330-gallon totes that contained product propylene glycol as stated by Mr. Fitzgerald.

Outside the Maintenance Back Door, there was one 330-gallon tote that contained spent plastic balls from the Kolene scrubber (water scrubber) as stated by Mr. Fitzgerald. There was one 330-gallon tote that contained product Ryd Lime that was utilized to eat the lime scale off of the plastic balls as stated by Mr. Fitzgerald. The wastewater/sludge from the cleaning process is disposed to the sewer (at the Engineering Bay) as stated by Mr. Fitzgerald. The grease sludge from the sewer interceptor at this location is cleaned out twice per year as stated by Mr. Fitzgerald.

Next, we inspected the Maintenance area. There was no waste in this area at the time of the inspection.

At the E-Bright Line 5 BMC area, plastic scrap is generated.

Next, we inspected the E-Bright 1 area. There was one SAA that consisted of one 55-gallon drum that contained waste paint as stated by Mr. Olivieri. The drum was labeled as "Hazardous Waste", and was open. There was no waste being added or removed at the time of the inspection. Pictures were taken.

At the Back Garage area, there was one SAA (for the Top Coat process) that consisted of one 55-gallon drum that contained waste paint and solvent as stated by Mr. Olivieri and Ms. Groggoza.

The drum was labeled as "Hazardous Waste", and was open. There was no waste being added or removed at the time of the inspection. Pictures were taken. There were two 5-gallon containers that contained spent solvent rags (butyl or ethyl acetate) and gloves that get picked up for laundering by Aramark as stated by Mr. Olivieri and Ms. Groggoza. The two 5-gallon containers were not labeled. Pictures were taken.

Next, we inspected the E-Bright 5 area. There was one SAA that consisted of one 55-gallon drum that contained waste paint as stated by Mr. Olivieri. The drum was labeled as "Hazardous Waste", and was closed.

At the Warehouse, there was no waste in this area at the time of the inspection.

At the Inspection area. There was no waste in this area at the time of the inspection.

Next, we inspected the Paint Storage area (Hazardous Waste Storage area). There were several 5-gallon containers that contained product paints, coatings, and hardeners as stated by Mr. Olivieri. There were several 55-gallon drums that contained product solvents as stated by Mr. Olivieri. There were two 55-gallon drums that contained product sulfuric acid as stated by Mr. Olivieri. At the North Side of the area, there were two 55-gallon drums situated on a pallet. Both drums were labeled as "Hazardous Waste", one drum was dated 6/30/14, and the other drum was dated 6/10/14, and both drums were closed. There was one 85-gallon drum that was situated on a pallet. The drum was labeled as "Hazardous Waste", was dated 6/2/14, and was closed. There were eight 55-gallon drums stacked two high on pallets. The labels on all eight drums were not visible. Pictures were taken. Mr. Olivieri utilized a fork truck to bring down the top row of drums for inspection. Six of the eight drums were dated within ninety days of the date of this inspection with the oldest date being 6/23/14. The other two drums were not marked with accumulation start dates. Mr. Olivieri and Ms. Groggoza both stated that the accumulation start period for both drums was the end of June 2014. All eight drums were labeled as "Hazardous Waste", and were closed.

At the South Side of the Paint Storage area (hazardous waste storage area), there were three 5-gallon containers that contained obsolete product paint. All three containers were labeled as "Obsolete Material", and were closed. Later during the inspection, Mr. Boggs stated that the obsolete product paint (dark gunmetal color) was usable and would be used at the facility. There were four 55-gallon drums. All four drums were dated within ninety days of the date of this inspection with the oldest date being 6/27/14. All four drums were labeled as "Hazardous Waste." Three of the four drums were closed. One of the drums dated 7/9/14, was open. Pictures were taken. There was a fire extinguisher, phone, spill containment equipment, and aisle space was sufficient. There was no decontamination equipment (eye wash station or emergency shower) in the area as stated by Mr. Olivieri and Ms. Groggoza.

Outside, there was one 55-gallon drum that was full of sludge type waste. The drum was not labeled and was open. Pictures were taken. There was another 55-gallon drum (1/8 full) that contained the same sludge type waste. The drum was not labeled and was open. Mr. Olivieri and

Ms. Grogoza were not aware of the contents in both drums. Pictures were taken. Later during the inspection, Mr. Boggs stated that the waste contents in both drums was waste molten sludge/salt (Kolene).

On the way to inspect the city sewer manhole, we observed JTR Resins. Mr. Boggs stated that the plastic waste is re-grinded at JTR Resins (separate division of and owned by Jay Industries, Inc.). JTR Resins is located on-site but is located in a separate building from Jay Plastics.

Next, we inspected the city sewer manhole where the City of Mansfield samples and monitors the effluent from the facility. A picture was taken.

The inspectors broke for lunch (left the facility) at approximately 1:40 p.m.

The inspectors arrived back at the facility at approximately 2:45 p.m.

Record Review

The review of records was conducted. Manifests are not kept on-site for at least 3 years. There were three manifests kept for 2014. There was no TSD signed manifest copy available on-site for a hazardous waste shipment (manifest # 012438420 JJK- shipment date of 2/26/14) in 2014. There was no TSD signed manifest copy available on-site for another hazardous waste shipment (manifest # 012430706 JJK- shipment date of 4/17/14) in 2014. There was no TSD signed manifest copy available on-site for another hazardous waste shipment (manifest # 013101079 JJK- shipment date of 6/17/14) in 2014. There were no manifests (generator or TSD copies) kept or provided for 2013. There was one manifest kept for 2012. The most recent manifests show that all hazardous waste is sent to the following TSDF: Chemtron Corporation (OHD066060609). The following transporter was also used: Chemtron Corporation (OHD066060609). All LDR notices were available for review on each manifest provided for each waste stream.

The facility's hazardous waste report for 2014 (summarizing year 2013) was on file and was reviewed. Also, past hazardous waste reports were retained for at least three years.

Waste determinations were documented either through analysis/waste profile or generator knowledge and MSDS. The TCLP (Project # L12-10275) analytical report performed by Alloway dated 1/19/12, for the crushed fluorescent bulb waste (sent to non-hazardous waste landfill) was reviewed. The waste profile for the centrifuge sludge from the water curtain recycle (paint sludge/hopper waste) was reviewed. The MSDS for the dark gunmetal 2K (product paint) was reviewed. There was no waste characterization documentation provided for the following waste streams: Kolene molten salt/sludge (disposed of at Crawford County Landfill), and grease sludge from the sewer interceptor (near Engineering Bay). There was no constituent/property analysis provided for the used oil (burned off-site by Adena in a space heater).

The weekly inspections for the Paint Storage area (hazardous waste storage area) were being conducted and documented. However, the following documented periods indicated missed

weekly inspections: 12/20/13 to 1/3/14; 11/22/13 to 12/6/13; 6/27/13 to 7/11/13; 3/28/13 to 4/11/13; and 3/7/12 to 3/21/12.

The inspections of the emergency equipment at Jay Plastics were being conducted and were documented. However, only one of several (approximately 10) eye wash stations was documented as being inspected as stated by Mr. Olivieri and Ms. Grogoza. All eye wash stations are inspected as stated by Mr. Olivieri and Ms. Grogoza.

There was a contingency plan in place for the facility. The plan was titled "Jay Industries, Inc. Hazardous Waste Contingency Plan", and no effective date was documented. The plan was incomplete as it did not document any of the required information. Ms. Grogoza stated that she is the facility's emergency coordinator.

There were fire extinguishers, spill containment kits, decontamination equipment that were inspected and phones in place throughout the facility. There had been no spills or fires related to hazardous waste at the facility. The fire extinguishers are inspected annually by Koorsen Fire & Security (Mansfield, Ohio). There have been tours conducted at the facility in the past by the Mansfield Fire Department, as stated by Ms. Grogoza. The Mansfield Police Department has become familiar with the facility layout due to responding to false alarms as stated by Ms. Grogoza. The facility is equipped with a public address system.

There was not a RCRA hazardous waste management training program in place at the facility at the time of the inspection as Ms. Grogoza stated that no RCRA training documentation was found at the time of the inspection. The annual RCRA training curriculum and the sign-in sheets that documented if any RCRA trainings were received, were not provided. Also, there were no records provided that indicated that the job titles, job descriptions, and type and amount of training needed were documented for the employees in hazardous waste management positions.

Closing Conference

We summarized the RCRA requirements for the following: waste characterization documentation, contingency plan, annual RCRA training records and training element documentation, manifest retention on-site, hazardous waste container management (open container and accumulation start date), hazardous waste container weekly inspections and documentation, used oil management, universal waste management/disposal, preparedness and prevention (decontamination equipment at the Paint Storage area) identified during the inspection. The inspection concluded at approximately 5:00 p.m.

Jay Plastics made no claim of confidential business information related to any pictures taken or documents received by U.S. EPA during the inspection.

Documents received during this inspection are as follows:

- Copy of waste profile for the centrifuge sludge from water curtain recycle (paint sludge/hopper waste)

- Copy of MSDS for dark gunmetal 2K (product paint)
- Copy of facility's Hazardous Waste Report for 2014 (summarizing year 2013)
- Copy of facility's contingency plan
- Copy of TCLP analytical report from Alloway dated 1/19/12 for the crushed fluorescent bulb waste

Documents given to Jay Plastics during this inspection are as follows:

- U.S. EPA Small Business Resources handout (compliance assistance)
- Region 5 and State Pollution Prevention contact handout
- Ohio EPA Onsite Pollution Prevention Assistance handout

A photo log is attached consisting of thirty-two (32) photos taken by U.S. EPA during the inspection.



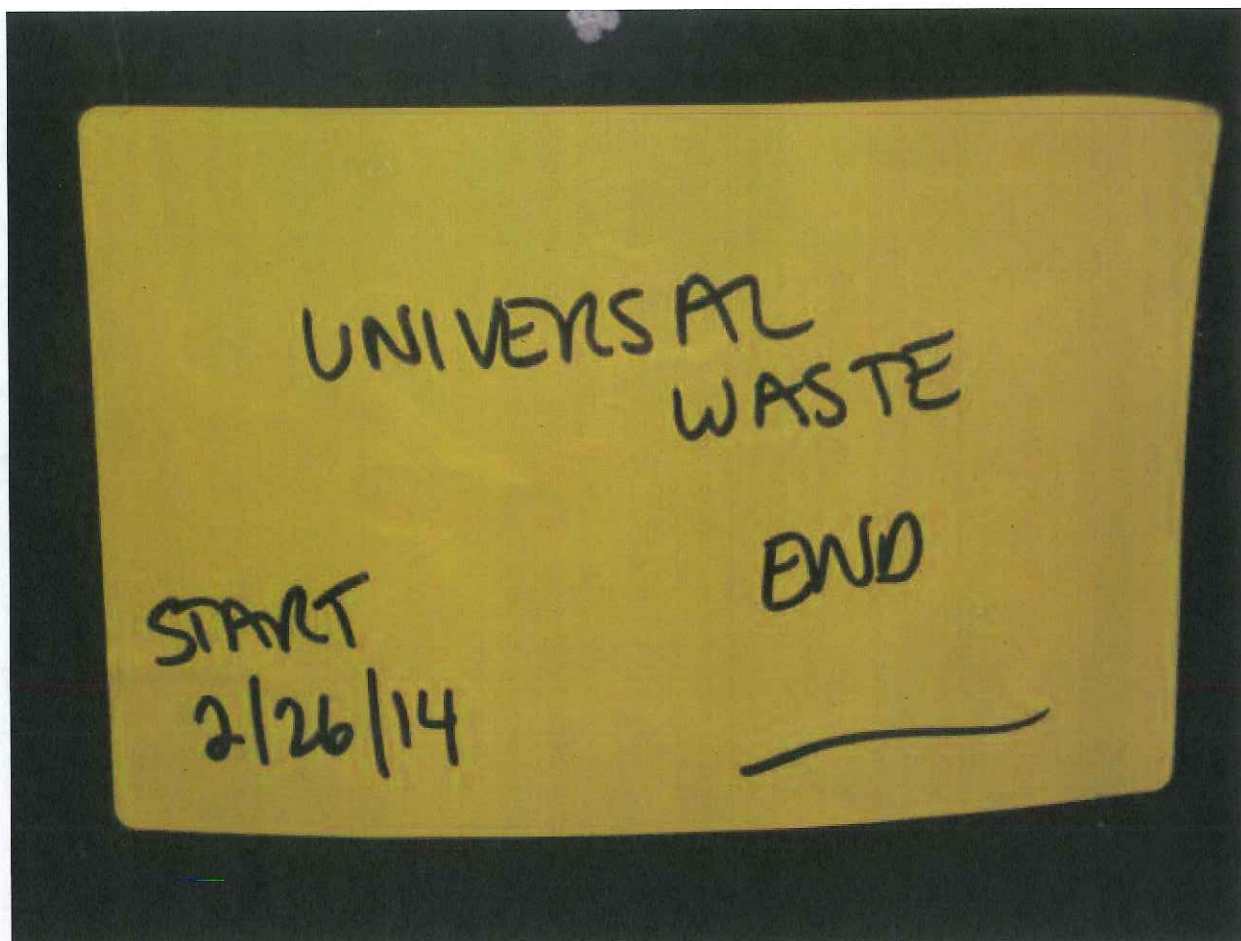
1. A view, at the Maintenance Lean Tube area, of three 55-gallon drums that contained crushed spent fluorescent bulbs (four and eight foot bulbs) as stated by Mr. Olivieri. The first drum was labeled as "Universal Waste", was dated 2/26/14, and was closed. The second drum was labeled as "Universal Waste", was dated 12/8/13, and was closed. The third drum was labeled as "Universal Waste" and "Crushed Bulbs", was dated 7/1/13, and was closed.

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2. Another view, at the Maintenance Lean Tube area, of one of the same drums from photo # 1.

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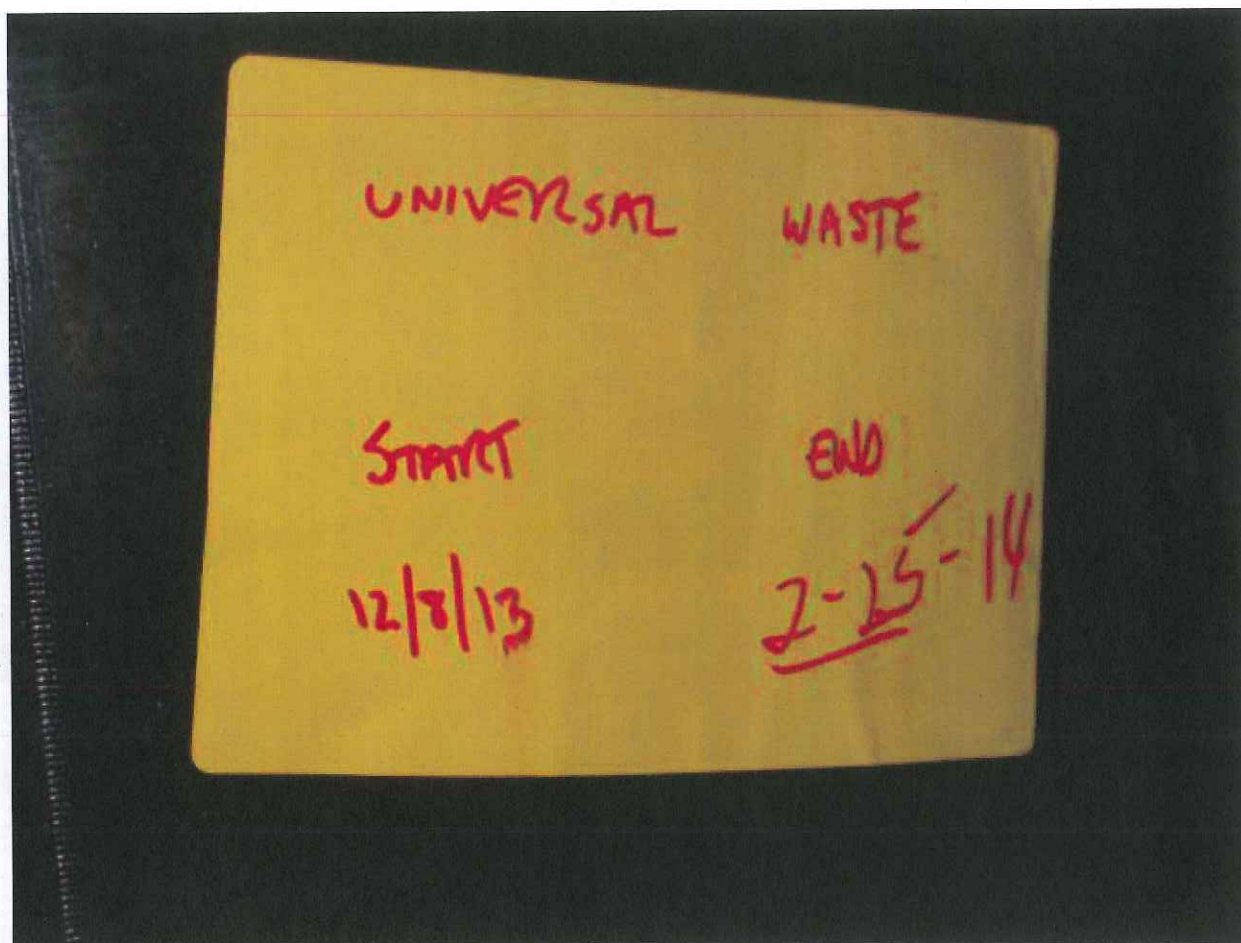
3. Another view, at the Maintenance Lean Tube area, of a label on the same drum from photos # 1 and # 2.

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4. Another view, at the Maintenance Lean Tube area, of one of the same drums from photos # 1 and # 2.

Jay Plastics, Inc., Mansfield, OH
Bryan Gangwisch, U.S. EPA 7/10/14



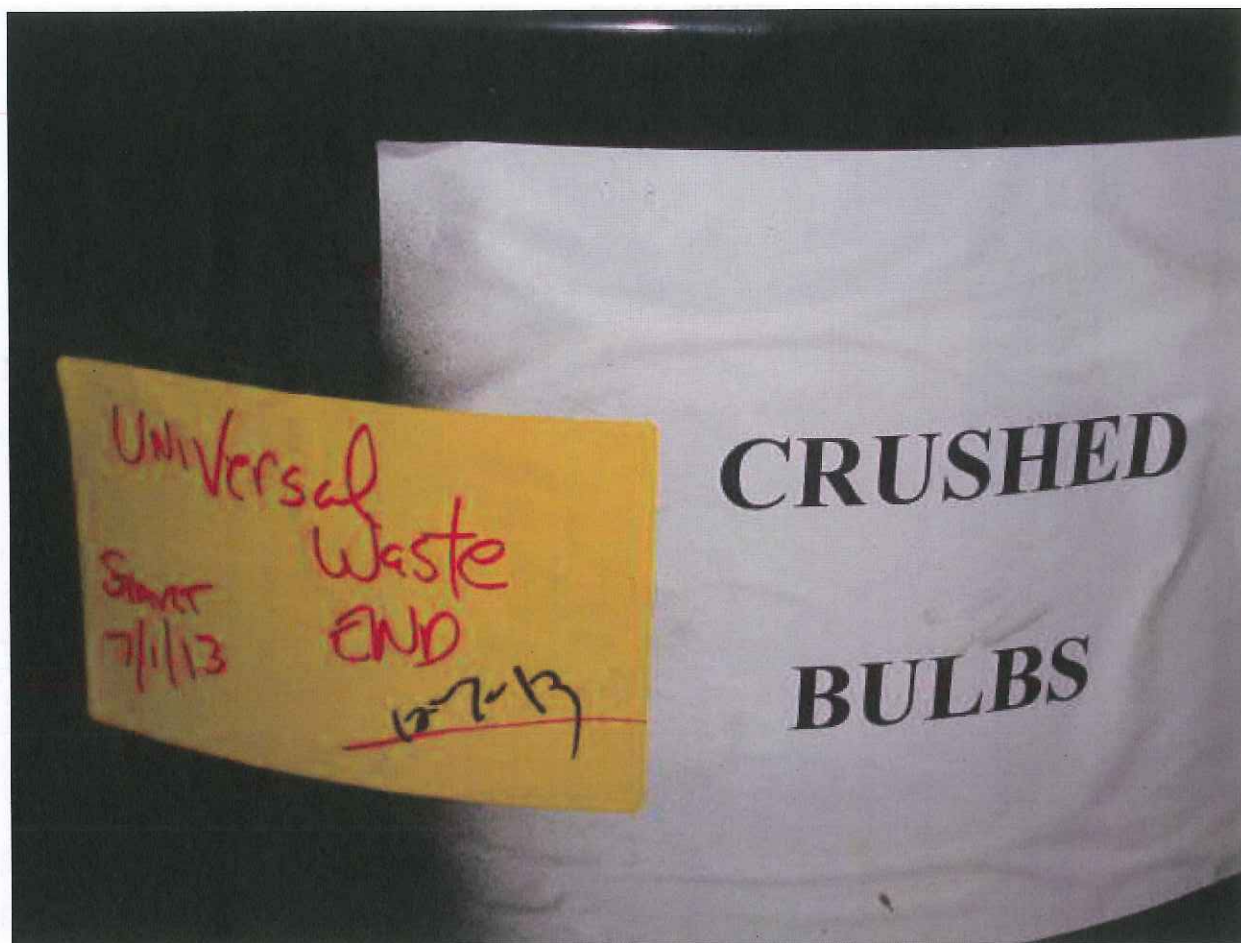
5. Another view, at the Maintenance Lean Tube area, of a label on the same drum from photos # 1, # 2, and # 4.

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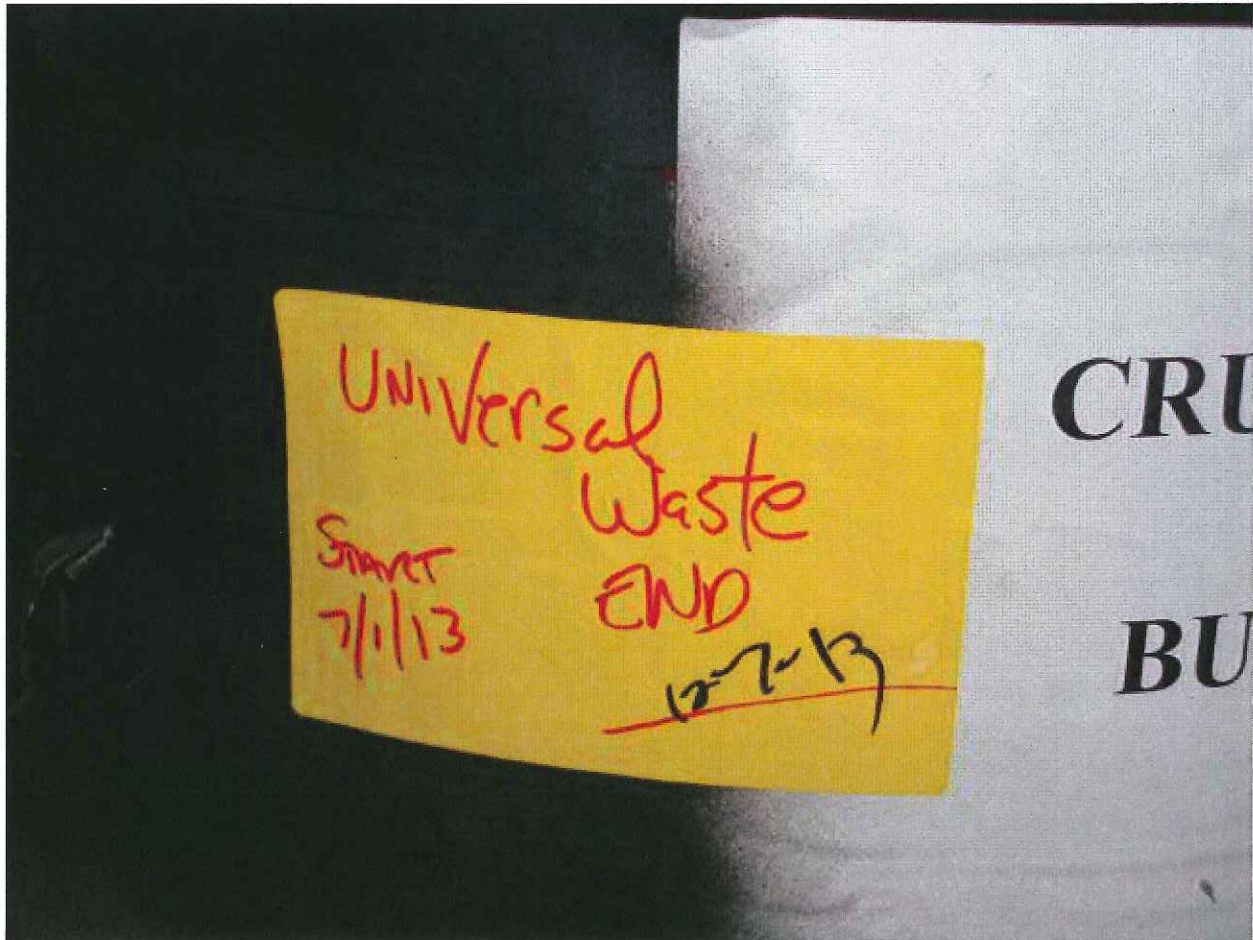
6. Another view, at the Maintenance Lean Tube area, of the same drum from photos # 1, # 2, and # 4.

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7. Another view, at the Maintenance Lean Tube area, of a label on the same drum from photos # 1, # 2, # 4, and # 6.

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8. Another view, at the Maintenance Lean Tube area, of a label on the same drum from photos # 1, # 2, # 4, # 6, and # 7.

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9. A view, at the Maintenance Lean Tube area, of two 55-gallon drums that contained used oil as stated by Mr. Olivieri and Ms. Grogoza. One of the drums (one with the red pump in it) was labeled as "Waste Oil", and was open. The other drum was not labeled.

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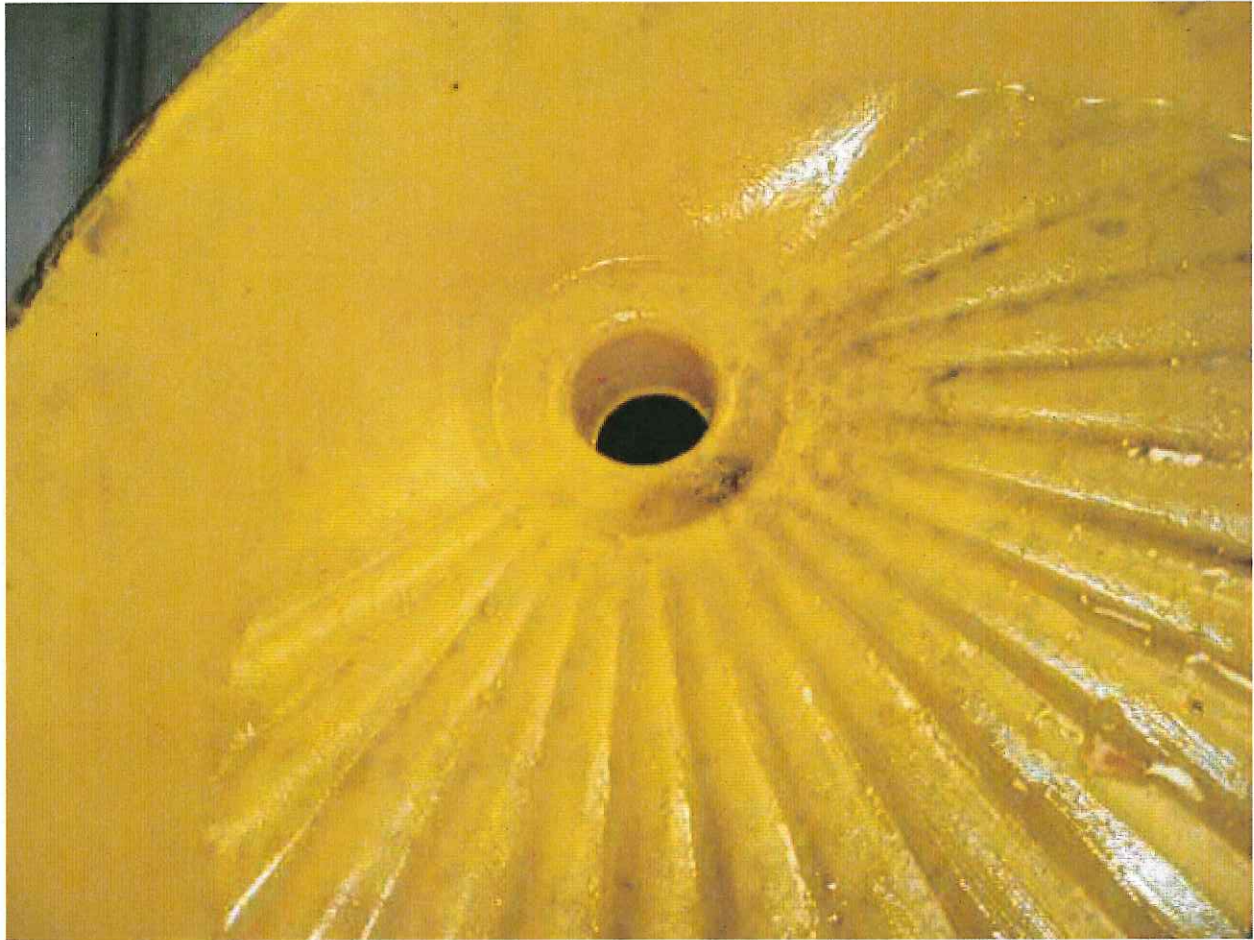
10. Another view, at the Maintenance Lean Tube area, of the same open drum from photo # 9.

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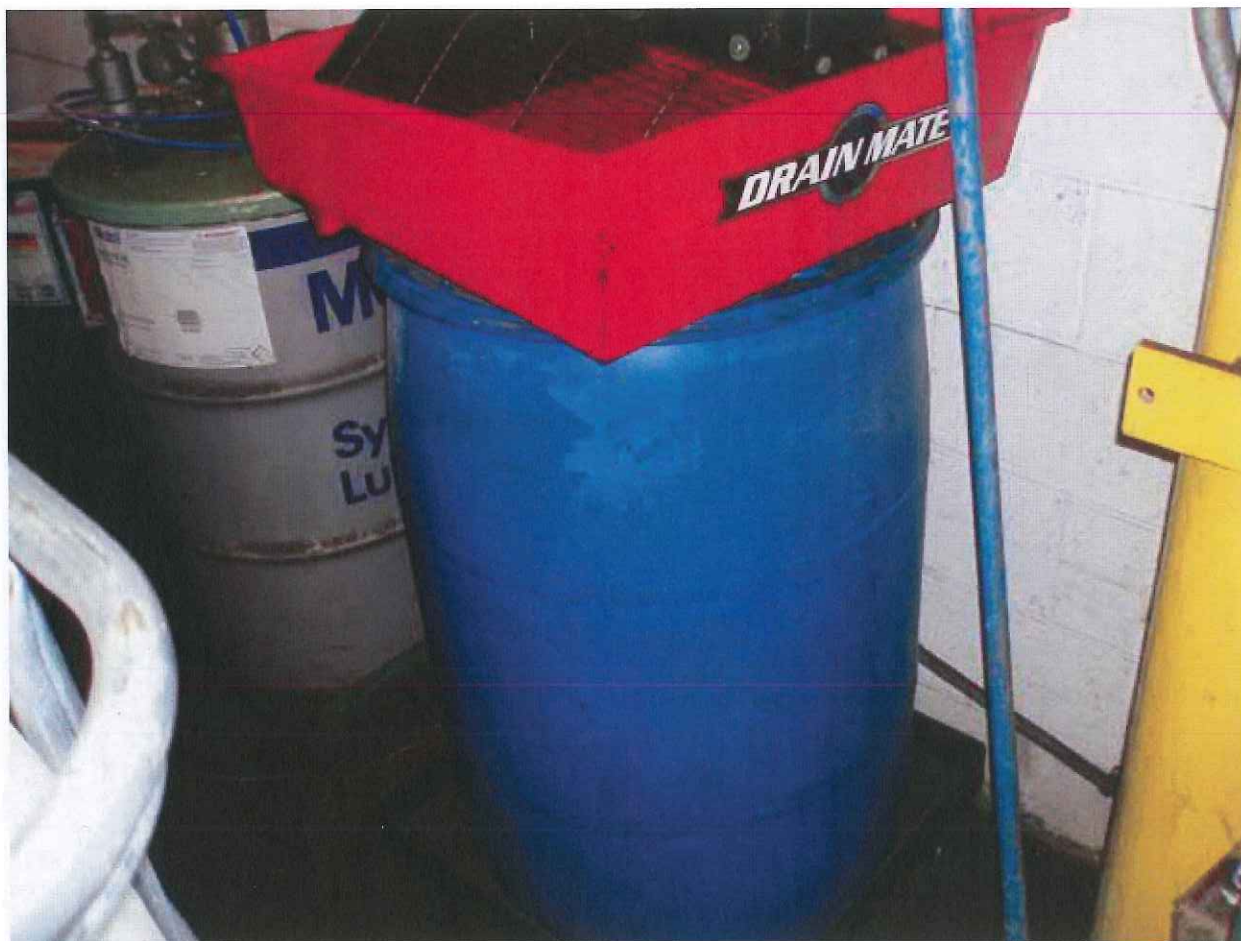
11. A view, at the Maintenance Lean Tube area, of one 330-gallon tote that contained used oil as stated by Mr. Fitzgerald. The tote was not labeled and was open. Mr. Fitzgerald also stated that the facility's used oil is picked up by Adena for burning.

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12. Another view, at the Maintenance Lean Tube area, of the same open tote from photo # 11.

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13. A view, at the Maintenance Lean Tube area, of one 55-gallon drum that contained used oil as stated by Mr. Fitzgerald. The drum was not labeled.

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14. A view, at the Maintenance Lean Tube area, of one 330-gallon drum that contained used oil as stated by Mr. Fitzgerald. The drum was not labeled and was open.

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15. Another view, at the Maintenance Lean Tube area, of the same open tote from photo # 14.

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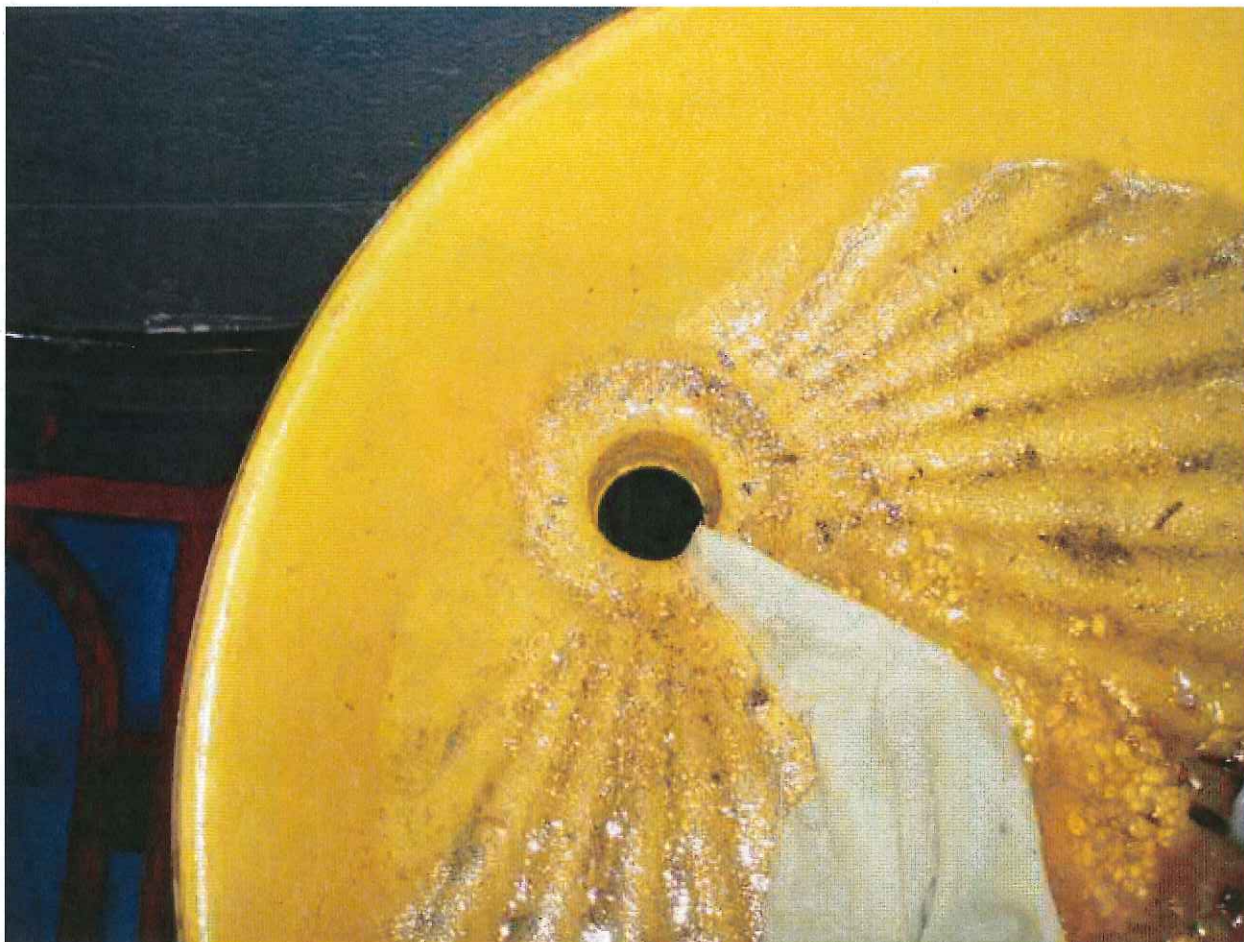
16. Another view, at the Maintenance Lean Tube area, of the same open tote from photos # 14 and # 15.

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17. A view, at the E-Bright 1 area, of one SAA that consisted of one 55-gallon drum that contained waste paint as stated by Mr. Olivieri. The drum was labeled as "Hazardous Waste", and was open. There was no waste being added or removed at the time of the inspection.

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18. Another view, at the E-Bright 1 area, of the same open drum from photo # 17.

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HAZARDOUS WASTE

FEDERAL LAWS PROHIBIT IMPROPER DISPOSAL

IF FOUND, CONTACT THE NEAREST POLICE OR
PUBLIC SAFETY AUTHORITY OR THE
U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME: **JAY PLASTICS**

ADDRESS: **150 E. LONGVIEW AVE**

CITY: **MANSFIELD** STATE: **OH** ZIP: **44903**

EPA ID NO. _____ EPA WASTE NO. _____

ACCUMULATION START DATE: **May 15, 2014** MANIFEST TRACKING NO. _____

[_____]

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

19. Another view, at the E-Bright 1 area, of the label on the same drum from photos # 17 and # 18.

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20. A view, at the Back Garage area, of one SAA (for the Top Coat process) that consisted of one 55-gallon drum that contained waste paint and solvent as stated by Mr. Olivieri and Ms. Grogoza. The drum was labeled as "Hazardous Waste", and was open. There was no waste being added or removed at the time of the inspection.

Jay Plastics, Inc., Mansfield, OH
Bryan Gangwisch, U.S. EPA 7/10/14

**HAZARDOUS
WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY
AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME Jay's Plastic

ADDRESS 150 E Longview PHONE _____

CITY Mansfield STATE OH ZIP 44905

EPA ID NO. / MANIFEST DOCUMENT NO. _____

ACCUMULATION START DATE _____ EPA WASTE NO. _____

[_____

_____] D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

21. Another view, at the Back Garage area, of the label on the same drum from photo # 20.

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22. Another view, at the Back Garage area, of the same open drum from photos # 20 and # 21.

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23. A view, at the Back Garage area, of two 5-gallon containers that contained spent solvent rags (butyl or ethyl acetate) and gloves that get picked up for laundering by Aramark as stated by Mr. Olivieri and Ms. Grogoza. The two 5-gallon containers were not labeled.

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24. A view, at the Paint Storage area (Hazardous Waste Storage area) (on the North Side of the area), of one 85-gallon drum that was situated on a pallet. The drum was labeled as "Hazardous Waste", was dated 6/2/14, and was closed. Also, a view of eight 55-gallon drums stacked two high on pallets. The labels on all eight drums were not visible.

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25. Another view, at the Paint Storage area (Hazardous Waste Storage area) (on the North Side of the area), of the same drums from photo # 24.

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26. Another view, at the Paint Storage area (Hazardous Waste Storage area) (on the North Side of the area), of the same drums from photos # 24 and # 25.

Jay Plastics, Inc., Mansfield, OH
Bryan Gangwisch, U.S. EPA 7/10/14

**HAZARDOUS
WASTE**

FEDERAL LAW PROHIBITS IMPROPER DISPOSAL
 IF FOUND, CONTACT THE NEAREST POLICE, OR PUBLIC SAFETY
 AUTHORITY, OR THE U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERATOR INFORMATION:

NAME Jay Plastics

ADDRESS 150 E Longview PHONE _____

CITY Mansfield STATE OH ZIP 44905

EPA ID NO. / MANIFEST DOCUMENT NO. 7/9/14 1

ACCUMULATION START DATE _____ EPA WASTE NO. _____

[]

D.O.T. PROPER SHIPPING NAME AND UN OR NA NO. WITH PREFIX

HANDLE WITH CARE!

OS-1122 (REV. 03-92) EPA, R.T. 1450 1-800-442-9633

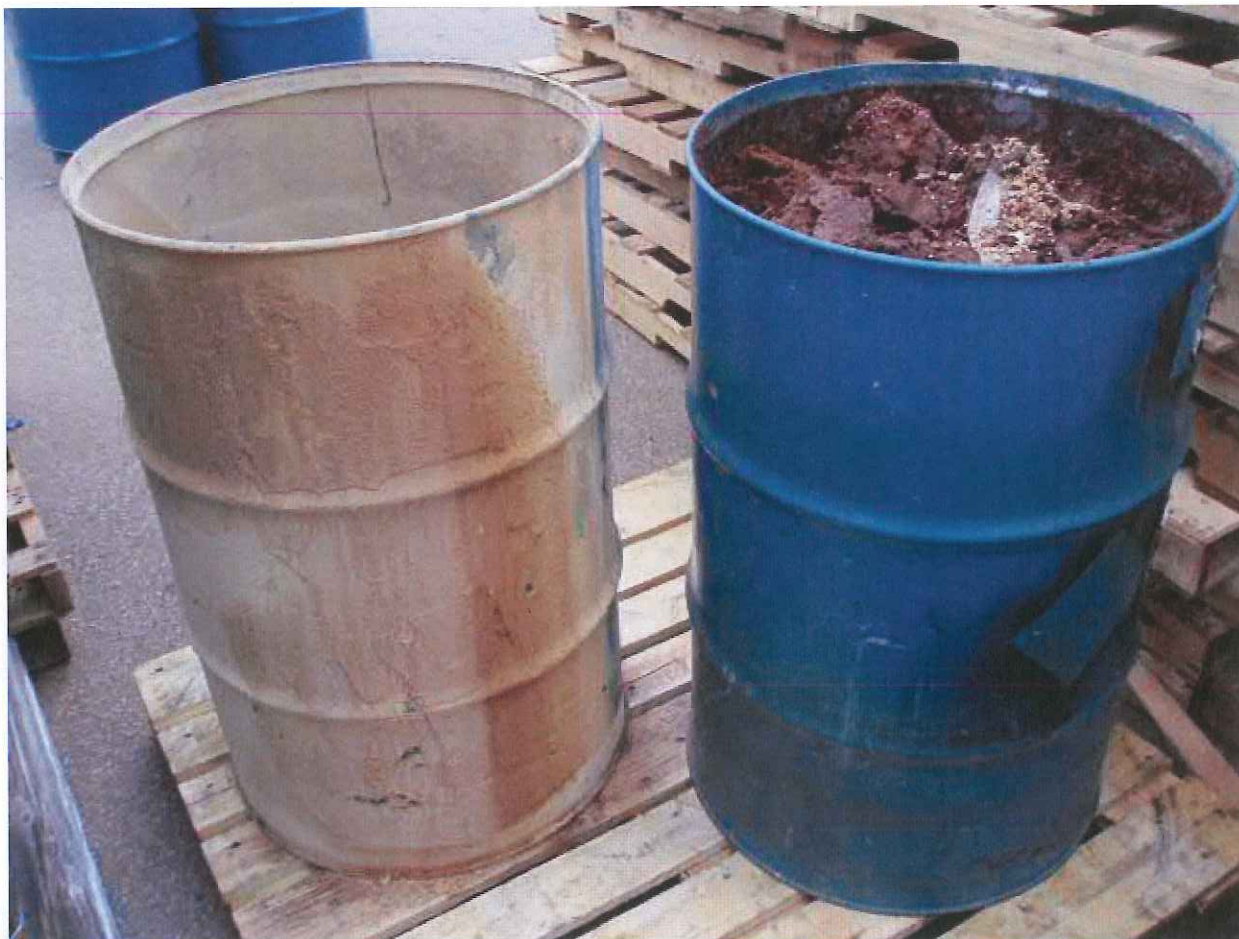
27. A view, at the South Side of the Paint Storage area (hazardous waste storage area), of a label on one 55-gallon drum labeled as "Hazardous Waste."
 This drum dated 7/9/14, was open.

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 Bryan Gangwisch, U.S. EPA 7/10/14



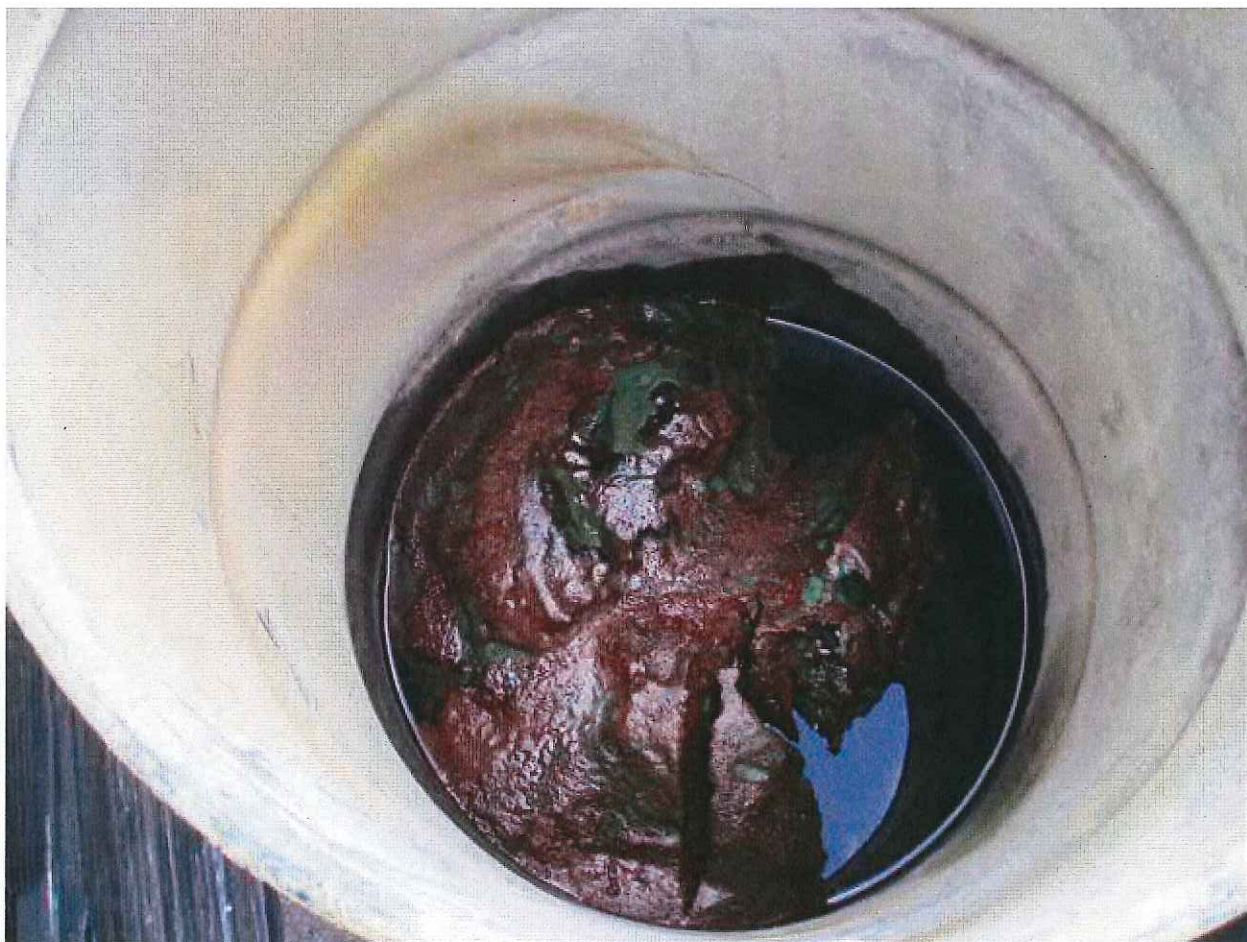
28. Another view, at the South Side of the Paint Storage area (hazardous waste storage area), of the same open drum from photo # 27.

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29. A view, outside, of one 55-gallon drum that was full of sludge type waste. The drum was not labeled and was open. Also, a view of another 55-gallon drum (1/8 full) that contained the same sludge type waste. The drum was not labeled and was open. Mr. Olivieri and Ms. Groggoza were not aware of the contents in both drums. Later during the inspection, Mr. Boggs stated that the waste contents in both drums was waste molten sludge/salt (Kolene).

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30. Another view, outside, of one of the same open drums from photo # 29.

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31. Another view, outside, of one of the same open drums from photo # 29.

Jay Plastics, Inc., Mansfield, OH
Bryan Gangwisch, U.S. EPA 7/10/14



32. A view, of the city sewer manhole, where the City of Mansfield samples and monitors the effluent from the facility.

Jay Plastics, Inc., Mansfield, OH
Bryan Gangwisch, U.S. EPA 7/10/14

7/10/14

Jag Plastics, Inc.

OHD000817858

LARGE QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS DESCRIPTION SUMMARY

CESQG: ≤100 Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.
 LQG: ≥ 1,000 Kg. (~300 gallons) of waste in a calendar month or ≥1 Kg. of acutely hazardous waste in a calendar month.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

GENERAL REQUIREMENTS

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
2.	Are records of waste determination being kept for at least 3 years? [3745-52-40(C)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
3.	Has the generator obtained a U.S. EPA identification number? [3745-52-12]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Were biennial reports filed with Ohio EPA by March 1 st of each even numbered year? [3745-52-41(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Are biennial reports kept on file for at least 3 years after the due date of the report? [3745-52-40(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
6.	Has the generator transported or caused to be transported hazardous waste to other than a facility authorized to manage the hazardous waste? [ORC 3734.02(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
7.	Has the generator disposed of hazardous waste on-site without a permit or at another facility other than a facility authorized to dispose of the hazardous waste? [ORC 3734.02(E)&(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
8.	Does the generator accumulate hazardous waste?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the LQG does not accumulate or treat hazardous waste, it is not subject to 52-34 standards. All other requirements still apply, e.g., annual reports, manifest, marking, record keeping, LDR, etc.

9.	Has the generator accumulated hazardous waste on-site in excess of 90 days without a permit or an extension from the director ORC §3734.02(E)&(F)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If F006 waste is generated and accumulated for > 90 days and is recycled see 3745-52-34(G)&(H).

10.	Does the generator treat hazardous waste in a: [ORC 3734.02(E)&(F)]	
a.	Container that meets 3745-66-70 to 3745-66-77?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Tank that meets 3745-66-90 to 3745-66-100 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

NOTE: If waste is treated to meet LDRs, use LDR checklist.

11.	Does the generator export hazardous waste? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Has the generator notified U.S. EPA of export activity? [3745-52-53(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Has the generator complied with special manifest requirements? [3745-52-54]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	For manifests that have not been returned to the generator: has an exception report been filed? [3745-52-55]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Has an annual report been submitted to U.S. EPA? [3745-52-56]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

[Facility Name/Inspection Date]

[ID number]

LQG & Generator LDR/May 2012

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e.	Are export related documents being maintained on-site? [3745-52-57(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
MANIFEST REQUIREMENTS				
12.	Have all hazardous wastes shipped off-site been accompanied by a manifest? (U.S. EPA Form 8700-22) [3745-52-20(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
13.	Have items (1) through (20) of each manifest been completed? [3745-52-20(A)(1)]&[3745-52-27(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: U.S. EPA Form 8700-22(A) (the continuation form) may be needed in addition to Form 8700-22. In these situations items (21) through (35) must also be completed. [3745-52-20(A)(1)]				
14.	Does each manifest designate at least one facility which is permitted to handle the waste? [3745-52-20(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: The generator may designate on the manifest one alternate facility to handle the waste in the event of an emergency which prevents the delivery of waste to the primary designated facility. [3745-52-20(C)]				
15.	If the transporter was unable to deliver a shipment of hazardous waste to the designated facility, did the generator designate an alternate TSD facility or give the transporter instructions to return the waste? [3745-52-20(D)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
16.	Have the manifests been signed by the generator and initial transporter? [3745-52-23(A)(1)&(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Remind the generator that the certification statement they signed indicates: 1) they have properly prepared the shipment for transportation and 2) they have a program in place to reduce the volume and toxicity waste they generate.				
17.	If the generator received a rejected load or residue, did the generator:			
a.	Sign item 20 of the new manifest or item 18c of the original manifest? [3745-52-23(F)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Provide the transporter a copy of the manifest? [3745-52-23(F)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Send a copy of the manifest to the designated facility that returned the shipment with 30 days after delivery of the rejected shipment? [3745-52-23(F)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
18.	If the generator did not receive a return copy of each completed manifest within 35 days of the waste being accepted by the transporter, did the generator contact the transporter and/or TSD facility to check on the status of the waste? [3745-52-42(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
19.	If the generator has not received the manifest within 45 days, did the generator file an exception report with Ohio EPA? [3745-52-42(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
20.	Are signed copies of all manifests and any exception reports being retained for at least three years? [3745-52-40]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: A generator who sends a shipment of hazardous waste to a TSD facility with the understanding that the TSD facility can accept and manage the waste and later receives that shipment back as a rejected load or residue may accumulate the waste on-site for <90 days or <180 days depending on the amount of hazardous waste on-site in that calendar month. [3745-52-34(M)]				
NOTE: Waste generated at one location and transported along a publicly accessible road for temporary consolidated storage or treatment on a contiguous property also owned by the same person is not considered "on-site" and manifesting and transporter requirements must be met. To transport "along" a public right-of-way the destination facility has to act as a transfer facility or have a permit because this is considered to be "off-site." For additional information see the definition of "on-site" in OAC rule 3745-50-10.				
PERSONNEL TRAINING				
21.	Does the generator have a training program which teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to their positions? [3745-65-16(A)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
22.	Does the personnel training program, at a minimum, include instructions to ensure that facility personnel are able to respond effectively to emergencies involving hazardous waste by familiarizing them with emergency procedures, emergency equipment and emergency systems (where applicable)? [3745-65-16(A)(3)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: For facility employees that receive emergency response training pursuant to OSHA regulations, the facility is not required to provide separate emergency response training, provided that the overall facility training meets all the requirements of OAC 3745-65-16(A). [3745-65-16(A)(4)]

23.	Is the personnel training program directed by a person trained in hazardous waste management procedures? [3745-65-16(A)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
24.	Do new employees receive training within six months after the date of hire (or assignment to a new position)? [3745-65-16(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
25.	Does the generator provide refresher training to employees during each period from January 1 st to December 31 st and does each training occur within 15 months after the previous training? [3745-65-16(C)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
26.	Does the generator keep records and documentation of:			
a.	Job titles? [3745-65-16(D)(1)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
b.	Job descriptions? [3745-65-16(D)(2)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
c.	Type and amount of training given to each person? [3745-65-16(D)(3)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
d.	Completed training or job experience required? [3745-65-16(D)(4)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
27.	Are training records for current personnel kept until closure of the facility and are training records for former employees kept for at least three years from the date the employee last worked at the facility? [3745-65-16(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: The following section can be used by the inspector to document that all personnel who are involved with hazardous waste management have been trained. The employees who need training (written and/or on-the-job) may include the following: environmental coordinators, drum handlers, emergency coordinators, personnel who conduct hazardous waste inspections, emergency response teams, personnel who prepare manifest, etc.

Job Performed	Name of Employee	Date Trained

CONTINGENCY PLAN

28.	Does the owner/operator have a contingency plan to minimize hazards to human health or the environment from fires, explosions or any unplanned release of hazardous waste? [3745-65-51(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
29.	Does the plan describe the following:			
a.	Actions to be taken in response to fires, explosions or any unplanned release of hazardous waste? [3745-65-52(A)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
b.	Arrangements with emergency authorities? [3745-65-52(C)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
c.	A current list of names, addresses and telephone numbers (office and home) of all persons qualified to act as emergency coordinator? [3745-65-52(D)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
d.	A list of all emergency equipment, including: location, a physical description and brief outline of capabilities? [3745-65-52(E)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
e.	An evacuation plan for facility personnel where there is possibility that evacuation may be necessary? [3745-65-52(F)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: If the facility already has a "Spill Prevention, Control and Countermeasures Plan" under 40 CFR Part 112 or some other emergency plan, the facility can amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with OAC requirements. The facility may develop one contingency plan which meets all regulatory requirements. Ohio EPA recommends that the plan be based on the "National Response Team's Integrated Contingency Plan Guidance (One Plan)." [3745-65-52(B)]

30.	Is a copy of the plan (plus revisions) kept on-site and been given to all emergency authorities that may be requested to provide emergency services? [3745-65-53(A)&(B)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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31.	Has the generator revised the plan in response to rule changes, facility, equipment and personnel changes, or failure of the plan? [3745-65-54]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
32.	Is an emergency coordinator available at all times (on-site or on-call)? [3745-65-55]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: The emergency coordinator shall be thoroughly familiar with: (a) all aspects of the facility's contingency plan; (b) all operations and activities at the facility; (c) the location and characteristics of waste handled; (d) the location of all records within the facility; (e) facility layout; and (f) shall have the authority to commit the resources needed to implement provisions of the contingency plan.

EMERGENCY PROCEDURES

33.	Has there been a fire, explosion or release of hazardous waste or hazardous waste constituents since the last inspection? If so:	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
a.	Was the contingency plan implemented? [3745-65-51(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Did the facility follow the emergency procedures in 3745-65-56(A) through (H)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Did the facility submit a report to the Director within 15 days of the incident as required by 3745-65-56(I)?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: OAC 3745-65-51(B) requires that the contingency plan be implemented immediately whenever there is a fire, explosion, or release of hazardous waste or hazardous waste constituents, which could threaten human health and the environment.

PREPAREDNESS AND PREVENTION

34.	Is the facility operated to minimize the possibility of fire, explosion, or any unplanned release of hazardous waste? [3745-65-31]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
35.	Does the generator have the following equipment at the facility, if it is required due to actual hazards associated with the waste:			
a.	Internal communications or alarm system? [3745-65-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
b.	Emergency communication device? [3745-65-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
c.	Portable fire control, spill control and decon equipment? [3745-65-32(C)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
d.	Water of adequate volume/pressure per documentation or facility rep? [3745-65-32(D)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: Verify that the equipment is listed in the contingency plan.

36.	Is emergency equipment tested (inspected) as necessary to ensure its proper operation in time of emergency? [3745-65-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
37.	Are emergency equipment tests (inspections) recorded in a log or summary? [3745-65-33] <i>not all eye wash stations on insp. log</i>	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
38.	Do personnel have immediate access to an internal alarm or emergency communication device when handling hazardous waste (unless the device is not required under 3745-65-32)? [3745-65-34(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
39.	If there is only one employee on the premises, is there immediate access to a device (eg. phone, hand held two-way radio) capable of summoning external emergency assistance (unless not required under 3745-65-32)? [3745-65-34(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
40.	Is adequate aisle space provided for unobstructed movement of emergency or spill control equipment? [3745-65-35]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
41.	Has the generator attempted to familiarize emergency authorities with possible hazards and facility layouts? [3745-65-37(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
42.	Where authorities have declined to enter into arrangements or agreements, has the generator documented such a refusal? [3745-65-37(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

SATELLITE ACCUMULATION AREA REQUIREMENTS

43.	Does the generator ensure that satellite accumulation area(s):		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
a.	Are at or near a point of generation? [3745-52-34(C)(1)]		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
b.	Are under the control of the operator of the process generating the waste? [3745-52-34(C)(1)]		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
c.	Do not exceed a total of 55 gallons of hazardous waste per waste stream? [3745-52-34(C)(1)]		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
d.	Do not exceed one quart of acutely hazardous waste at any one time? [3745-52-34(C)(1)]		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
e.	Containers are closed, in good condition and compatible with wastes stored in them? [3745-52-34(C)(1)(a)]		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
f.	Containers are marked with words "Hazardous Waste" or other words identifying the contents? [3745-52-34(C)(1)(b)]		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
44.	Is the generator accumulating hazardous waste(s) in excess of the amounts listed in the preceding question? If so:		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
a.	Did the generator comply with 3745-52-34(A)(1) through (4) or other applicable generator requirements within three days? [3745-52-34(C)(2)]		Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
b.	Did the generator mark the container(s) holding excess with the accumulation date when the 55 gallon (one quart) limit was exceeded? [3745-52-34(C)(2)]		Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>

NOTE: The satellite accumulation area is limited to 55 gallons of hazardous waste accumulated from a distinct point of generation in the process under the control of the operator of the process generating the waste (less than 1 quart for acute hazardous waste). There could be individual waste streams accumulated in an area from different points of generation.

USE AND MANAGEMENT OF CONTAINERS IN <90 DAY ACCUMULATION AREAS

45.	Has the generator marked containers with the words "Hazardous Waste?" [3745-52-34(A)(3)]		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
46.	Is the accumulation date on each container? [3745-52-34(A)(2)] <i>2 drums</i>		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
47.	Are hazardous wastes stored in containers which are:		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
a.	Closed (except when adding/removing wastes)? [3745-66-73(A)] <i>1 drum</i>		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
b.	In good condition? [3745-66-71]		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
c.	Compatible with wastes stored in them? [3745-66-72]		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
d.	Handled in a manner which prevents rupture/leakage? [3745-66-73(B)]		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>

NOTE: Record location on process summary sheets, photograph the area, and record on facility map.

48.	Is the container accumulation areas(s) inspected at least once during the period from Sunday to Saturday? [3745-66-74]		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
a.	Are inspections recorded in a log or summary? [3745-66-74]		Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>	N/A	<input type="checkbox"/>
49.	Are containers of ignitable or reactive wastes located at least 50 feet (15 meters) from the facility's property line? [3745-66-76]		Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input type="checkbox"/>
50.	Are containers of incompatible wastes stored separately from each other by means of a dike, berm, wall or other device? [3745-66-77(C)]		Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>
51.	If the generator places incompatible wastes, or incompatible wastes and materials in the same container, is it done in accordance with 3745-65-17(B)? [3745-66-77(A)]		Yes	<input type="checkbox"/>	No	<input type="checkbox"/>	N/A	<input checked="" type="checkbox"/>

52.	If the generator places hazardous waste in an unwashed container that previously held an incompatible waste, is it done in accordance with 3745-65-17(B)? [3745-66-77(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: OAC 3745-65-17(B) requires that the generator treat, store, or dispose of ignitable or reactive waste, and the mixture or commingling of incompatible wastes, or incompatible wastes and materials so that it does not create undesirable conditions or threaten human health or the environment.				
53.	If the generator has closed a <90 day accumulation area does the closure appear to have met the closure performance standard of 3745-66-11? [3745-52-34(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: Please provide a description of the unit and documentation provided by the generator for the file to demonstrate that closure was completed in accordance with the closure performance standards. If the generator has closed a <90 day tank, closure must also be completed in accordance with OAC 3745-66-97 (except for paragraph C of this rule). [3745-52-34]				
PRE-TRANSPORT REQUIREMENTS				
54.	Does the generator package/label its hazardous waste in accordance with the applicable DOT regulations? [3745-52-30, 3745-52-31 and 3745-52-32(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
55.	Does each container ≤119 gallons have a completed hazardous waste label? [3745-52-32(B)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
56.	Before off-site transportation, does the generator placard or offer the appropriate DOT placards to the initial transporter? [3745-52-33]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
NOTE: Continue with the generator LDR requirements on the next page.				

GENERATOR LDR REQUIREMENTS

NOTE: This LDR checklist does not include the requirements for generators that treat to meet LDR standards. If the generator treats, the inspector should use the stand-alone Generator LDR checklist instead of this checklist.

GENERAL REQUIREMENTS

1.	If LDRs do not apply, does the generator have a statement that lists how the HW was generated, why LDRs don't apply and where the HW went? [3745-270-07(A)(7)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input checked="" type="checkbox"/>
2.	Did the generator determine if the HW/soil must be treated to meet the LDR treatment standard prior to disposal? Generator knowledge or testing may be used. [3745-270-07(A)(1)] If not,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Did the generator send the waste to a permitted HW TREATMENT facility? [3745-270-07(A)(1)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

NOTE: This is done by determining if the HW/soil contains levels of constituents greater than the levels given in its LDR treatment standard in 3745-270-40. However, if a specific treatment method is given in 3745-270-40 for the HW, no determination is required [3745-270-07(A)(1)(b)]. If soil, generator can choose to have soil treated to LDR levels given in 3745-270-49 (alternative treatment levels for soils).

3.	Does the generator have documentation of how he determined whether the HW/soil meets or does not meet the LDR treatment standard in 2, above? [3745-270-07(A)(6)(a) or 3745-270-07(A)(6)(b)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
4.	Does the generator keep the documentation required in #2, above, on-site for at least three years from the last date the HW/soil was sent on-site/off-site for treatment/disposal? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
5.	Does the generator generate a listed HW that exhibits a characteristic? If yes,	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	Did the generator determine if the listed HW exhibits a characteristic that is not treated under the LDR treatment standard for the listed HW? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

FOR EXAMPLE: F006 that exhibits the characteristic for silver or K062 that is corrosive, D002. Review LDR treatment standard in 3745-270-40 to determine what constituents the listed HW is treated for.

6.	Did the generator determine if its characteristic HW contains underlying hazardous constituents that need to be treated? [3745-270-09(A)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: This is done by evaluating which underlying hazardous constituents (UHC) are in the HW at levels above the universal treatment standards given in 3745-270-48. This requirement does not apply to high total organic carbon (i.e., contains >10% TOC) D001 wastes or listed HWs.

NOTE: Written documentation of this determination is not required.

7.	Did the generator treat his HW /soil on-site <u>to meet</u> the LDR treatment standard?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
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NOTE: If "Yes" see question #16.

8.	Did the generator send a one-time LDR notification form to the TSD with the first shipment to that facility? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
a.	If the generator chose not to make the determination of whether his waste must be treated, did he send a notice to the TSD facility with each shipment? [3745-270-07(A)(2)] If so, did the notice include:	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
i.	Applicable HW codes?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
ii.	Manifest number of the first shipment to the TSD?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
iii.	A statement that conveys that the HW may or may not be subject to the LDR treatment standards and the TSD must make that determination.?"	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
9.	Did the generator resubmit the LDR notification form to the TSD when the HW changed or the generator used a new TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
10.	Does the generator have a copy of the LDR notification form/notice on file?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>

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		[3745-270-07(A)(2)]		
	a.	Is the form/notice kept on file for three years after last HW shipped? [3745-270-07(A)(8)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTIFICATION FORM				
11.	Does the LDR Notification form contain the following information:			
	a.	Manifest number of the first waste shipment to the TSD? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
	b.	Applicable waste codes (includes characteristic codes for a listed HW if applicable)? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
	c.	A statement that conveys that the HW is subject to LDRs and must be treated to meet LDR treatment requirements? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
	d.	A designation whether the HW is a wastewater or non-wastewater? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: A wastewater contains <1% by wt. total suspended solids (TSS) and <1% by wt. TOC. If you doubt the HW is a wastewater or non-wastewater, the HW can be tested using for example, Standard Methods (SM) 160.2 for TSS, SW-846 method 9060a for TOC.				
	e.	Designation of the waste subcategory when applicable? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Subcategories are found on the LDR treatment standards table under the applicable waste code. Not all HWs have subcategories				
	f.	A listing of the underlying hazardous constituents for which a characteristic waste must be treated? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the waste is high TOC D001 or the TSD tests its treatment residues for all underlying hazardous constituents.				
	g.	If the HW is F001-F005 or F039, did the generator note on the LDR form what solvents or constituents, respectively, the waste contains and must be treated for? [3745-270-07(A)(2)]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/> N/A <input type="checkbox"/>
NOTE: Not required if the TSD tests its treatment residues for all underlying hazardous constituents.				
PROHIBITED DILUTION				
12.	Is the HW treated by burning?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
		If "No" go to #15.		
13.	Is the HW a metal-bearing HW?		Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: Generally, metal-bearing HWs contain heavy metals above TCLP levels or were listed due to the presence of metals. A list of the restricted metal-bearing HWs is given in the Appendix to 3745-270-03.				
14.	a.	Metal-bearing HWs cannot be incinerated, combusted or, blended and burned for fuel unless <u>one</u> of the following conditions apply. [3745-270-03(c)]		
	i.	Contains > 1% TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	ii.	Contains organic constituents or cyanide at levels greater than the UTS levels?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iii.	Is made up of combustible material e.g., paper, wood, plastic?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	iv.	Has a reasonable heating value (e.g., > 5000 Btu)?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	v.	Co-generated with a HW that must be combusted?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b.	If all responses to 14 a.i. through 14 a.v. are "No", HW is being improperly treated by dilution, violation of 3745-270-03(C). Is HW being treated by dilution?	Yes <input type="checkbox"/>	No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Was the HW treated by wastewater treatment?		Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

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a.	Is a LDR treatment method, other than DEACT or a numerical value, specified for the waste? [3745-270-03(B) and 3745-270-40(A)(3)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: If "Yes", HW is improperly being treated by dilution.				
b.	Does the waste carry the D001 code <u>and</u> contain $\geq 10\%$ TOC?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Does the wastewater treatment process include a process to separate/recover the organic phase of the waste?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
NOTE: If the answers to b & c are "yes" and "no", respectively, waste is improperly being treated by dilution and generator is in violation of [3745-270-03(B)] and 3745-270-40(A)(3)].				
NOTE: A list of separation/recovery processes are given in 3745-270-42 under RORG.				

7/10/14 Jay Plastics, Inc. OHD000.817858

Inspection Checklist for Subpart CC: Air Emission Standards (Containers)

Item # 40 CFR:

CC-1	265.1080	Do any of the following exclusions apply? If yes, please circle.	YES	<input checked="" type="radio"/> NO
<p>Applicability: The air emission requirements apply to units subject to subpart I * unless the following apply (circle if applicable):</p> <ol style="list-style-type: none"> 1. Waste was placed in unit prior to Oct. 6, 1996, and none has been added since. 2. The container capacity is less than .1 cubic meter (26 gallons) 3. A unit (e.g. tank) has stopped adding waste and is undergoing closure 4. The unit is used solely for onsite treatment or storage as a result of remedial activities required under corrective action, Superfund, or other similar state program 5. The unit is used solely to manage radioactive mixed waste 6. The unit is regulated by and operates in accordance with Clean Air Act regulations <p>*Note: 1. Satellite containers are exempt 2. CESQG's and SQG's are exempt</p>				
CC-2	265.1083	Do any of the following exemptions apply? If yes, please circle	YES	<input checked="" type="radio"/> NO
<p>General Standards: The owner/operator must control air emissions from waste management units except the unit is exempt if (please circle if applicable):</p> <ol style="list-style-type: none"> 1. All hazardous waste entering the unit has an average VO concentration at the point of origination less than 500 parts per million by weight (waste determination required) 2. The organic content of all waste entering the unit has been reduced by one of the 8 acceptable destruction or removal processes. 3. The unit is a tank used for certain biological treatment 4. The hazardous waste placed in the unit meets the LDR numerical concentration limits or has been treated using the specified LDR treatment technology (for organics) 5. The unit is a tank used for bulk feed to an incinerator and meets certain requirements 				
CC-3	265.1084	Waste Determination:	<input checked="" type="radio"/> Determination Not Needed	<input type="radio"/> Determination Needed
<p>Was the VO concentration properly determined for each waste which the facility manages in a unit which does not meet Subpart CC requirements? The concentration must be determined by either direct measurement or knowledge. Please see 265.1084 for specific requirements for measurement and knowledge. Determination is <u>not</u> needed for waste managed in containers which meet standards. It may be necessary to evaluate container management prior to requiring VO concentration determination.</p>				

#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency		NA	NI	OK	DF
CONTAINER MANAGEMENT 265.1087						
	<input checked="" type="radio"/> Level 1	Level 2	Level 3			
	Larger than 26.4 gallons and less than or equal to 122 gallons, or larger than 122 gallons and do not manage H.W. in light material service	Larger than 122 gallons and manage H.W. "in light material service" (definition at 265.1081)	Larger than 26.4 gallons and treat H.W. by a stabilization process			
CC-4	265.1087	Controls	NA	NI	OK	<input checked="" type="radio"/> DF
	<p>One of the following:</p> <ul style="list-style-type: none"> -Use containers that meet DOT requirements -Use a cover and control with no visible gaps, holes or other open spaces into the interior of the container -Use organic vapor suppression on or above the container <p>265.1087(c)</p>	<p>One of the following:</p> <ul style="list-style-type: none"> -Use containers that meet DOT requirements -Use containers that operate with no detectable emissions (method 21) -Use containers that are demonstrated to be vapor-tight within the last 12 months (method 27) <p>265.1087(d)</p>	<p>-Containers used to stabilize H.W. with volatile organics greater than 500 ppm</p> <p>-For waste stabilized in a container either:</p> <ol style="list-style-type: none"> 1. container must be vented directly to a control device; or 2. container is vented inside an enclosure which is exhausted through a closed vent to a control device <p>-Conservation vents are not allowed</p> <p>265.1087(b)(2)</p>			

Level 1			Level 2		Level 3			
#	NA=Not Applicable, NI=Not Inspected, OK= In Compliance, DF= Deficiency				NA	NI	OK	DF
CC -5	265.1087	Waste transfer requirements						
No waste transfer requirements apply		-Waste transfer requirements apply regardless of container alternative used in level 2 -Transfer waste into or out of a container in such a manner as to minimize exposure of the waste to the atmosphere. Acceptable methods include a submerged fill pipe, vapor recovery system, or fitted opening with a line purge 265.1087(b)(3)			Not applicable			
CC-6	265.1087	Operating requirements			NA	NI	OK	DF
The covers, openings, and closure devices should be closed except: 1. When transferring H.W. in and out of the containers 2. between batch transfer not exceeding 15 minutes between transfer (note: if the person performing the transfer leaves the area, or the process shuts down, the container must be closed) 3. While performing sampling and equipment access 4. Conservation and safety vents are allowed -Containers may be open while performing sampling or equipment access -Safety valves and conservation vents may be used if normally left in close position -A cover need not to be on a RCRA empty container, as defined in 40 CFR 261.7 265.1087(c)(3), (d)(3)					-If the vapors are directly vented to a control device, there are specific design and operating criteria that must be met same as tanks that have closed vent and control device systems -If an enclosure is used, the enclosure must meet the design and operating criteria specified in "Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure" under 40 CFR 52.741 The container, enclosure, control device or closed vent system may have safety relief devices.			
CC-7	265.1089	Inspection requirements			NA	NI	OK	DF
Minimal inspection required: - when facility accepts container and it is not emptied within 24 hours -if wastes are stored greater than a year, then visually inspect once a year If inspections are required, facility must develop written plan and schedule to perform inspection 265.1087(c)(4), (d)(4)					Inspection requirements are the same as for tanks			
CC- 8	265.1087	Repair requirements			NA	NI	OK	DF
When a defect is detected; attempt to repair within 24 hours must be made and: 1. Repair within 5 calendar days or empty and remove the container from service 2. Do not use until defect is repaired 265.1087(c)(4), (d)(4)					Necessary corrective measures shall be <u>immediately</u> implemented to ensure that the control device is operated in compliance			
CC- 9	265.1090	Recordkeeping requirements			NA	NI	OK	DF
-If container exceeds 122 gallons and does not meet DOT standards, records indicating that the container is not managing H.W. in light material service		Since Level 2 waste is "in light material service", no records need to be kept			Depends upon how the organic emissions are vented: -If an enclosure is used, records must be maintained for the most recent set of calculations and measurements performed to verify that the enclosure meets the criteria of a permanent total enclosure (Procedure T) -Records for the closed vent and control device system are the same for those used on tanks(265.1090)(e)			

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Jay Plastics, Inc.

OHD000817858

USED OIL INSPECTION CHECKLIST **GENERATORS, COLLECTION CENTERS AND AGGREGATION POINTS**

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1.	Does the generator manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: For example, used oil contaminated scrap metal stored in a pile.

2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).

GENERATOR STANDARDS

4.	Does the generator mix hazardous waste with used oil? If so,	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the mixture managed as specified in 3745-279-10(B)? [3745-279-21(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Used Oil mixed with listed (3745-51-30 to 3745-51-35) or characteristic (3745-51-20 to 3745-51-24) hazardous waste are subject to regulation as a hazardous waste, unless the listed hazardous waste is listed solely because it exhibits a hazardous characteristic, and the resultant mixtures do not exhibit a characteristic. Mixtures of used oil and CESQG hazardous waste are subject to OAC Chapter 3745-279.

5.	Does the generator of a used oil containing greater than 1,000 ppm total halogens manage the used oil as a hazardous waste unless the presumption is rebutted successfully? [3745-279-21(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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NOTE: If used oil contains greater than 1000 ppm total halogens, it is presumed to be listed hazardous waste until the presumption is successfully rebutted.

6.	Does the generator store used oil in tanks; or containers; or a unit(s) subject to regulation as a hazardous waste management unit? [3745-279-22(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
7.	Are containers and aboveground tanks used to store used oil in good condition with no visible leaks? [3745-279-22(B)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
8.	Are containers, above ground tanks, and fill pipes used for underground tanks clearly labeled or marked "Used Oil?" [3745-279-22(C)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
9.	Has the generator, upon detection of a release of used oil, done the following: [3745-279-22(D)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Stopped the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Contained the release?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Cleaned up and properly managed the used oil and other materials?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Repaired or replaced the containers or tanks prior to returning them to service, if necessary?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

ON-SITE BURNING IN SPACE HEATER

10.	Does the generator burn used oil in used-oil fired space heaters? [3745-279-23] If so:	
a.	Does the heater burn only used oil that owner/operator generates or used oil received from household do-it-yourself (DIY) used oil generators?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

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b.	Is the heater designed to have a maximum capacity of not more than 0.5 million BTU per hour?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
c.	Are the combustion gases from heater vented to the ambient air?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Ash accumulated in a space heater must be managed in accordance with 3745-279-10(E).

GENERATOR TRANSPORTATION

11.	Does the generator have the used oil hauled only by transporters that have obtained a U.S. EPA ID#? [3745-279-24]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
12.	If the generator self-transported used oil to an approved collection site or to an aggregation point owned by the generator: [3745-279-24]			
a.	Does the generator transport used oil in a vehicle owned by the generator or an employee of the generator? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
b.	Does the generator transport more than 55 gallons of used oil at any time? [3745-279-24]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Used oil generators may arrange for used oil to be transported by a transporter without a U.S. EPA ID # if the used oil is reclaimed under a contractual agreement (i.e., tolling arrangement).

COLLECTION CENTERS AND AGGREGATION POINTS

13.	Is the DIY used oil collection center in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-30]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
14.	Is the non-DIY used oil collection center registered with Ohio EPA? [3745-279-31]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
15.	Is the used oil aggregation point in compliance with the generator standards in 3745-279-20 to 3745-279-24? [3745-279-32]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>

NOTE: Complete Used Oil Generator and any other applicable used oil handler checklist (e.g., marketer, burner, etc.) for used oil collection centers and aggregation points.

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USED OIL INSPECTION CHECKLIST - MARKETERS

NOTE: A facility is subject to the federal SPCC regulations (40 CFR 112) if it is non-transportation related (e.g., fixed) and has an aggregate above ground storage capacity greater than 1,320 gallons or a total underground storage capacity greater than 42,000 gallons of oil (including used oil), and there is reasonable expectation of a discharge to navigable waters.

PROHIBITIONS

1.	Does the Used Oil Marketer manage used oil in a surface impoundment or waste pile? If yes:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Is the surface impoundment or waste pile regulated as a hazardous waste management unit? [3745-279-12(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: For example, scrap metal contaminated with used oil or used oil managed in a surface impoundment (i.e., pond).		
2.	Is used oil used as a dust suppressant? [3745-279-12(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
3.	Is off-specification used oil fuel burned for energy recovery in devices specified in 3745-279-12(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
NOTE: All used oil burned for energy recovery is presumed to be off-specification until all requirements of OAC rule 3745-279-11 have been met.		
NOTE: Multiple used oil checklists may be applicable if used oil handler is performing multiple tasks (e.g., if generating used oil and shipping directly to a burner, complete generator and marketer checklists at a minimum).		
4.	Does the used oil fuel marketer initiate shipments of off-spec used oil only to a used oil burner that has a U.S. EPA ID# and burns the used oil in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-71]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the specification for used oil fuel under 3745-279-11 keep copies of analyses of the used oil (or other information used to make the determination) for at least three years? [3745-279-72(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
6.	Has the used oil marketer notified Ohio EPA or U.S. EPA and obtained a U.S. EPA ID#? [3745-279-73(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
7.	Does the used oil marketer keep a record of each shipment of off-spec used oil directed to a used oil burner? [3745-279-74(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Does each record include the name and address of the transporter who delivers the used oil to the burner? [3745-279-74(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Does each record include the name and address of the burner who receives the oil? [3745-279-74(A)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Does each record include the U.S. EPA ID# of the transporter that delivers the used oil to the burner? [3745-279-74(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
d.	Does each record include the U.S. EPA ID# of the burner? [3745-279-74(A)(4)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
e.	Does each record include the quantity of the used oil shipped? [3745-279-74(A)(5)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
f.	Does each record include the date of shipment? [3745-279-74(A)(6)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
8.	Does the generator, transporter, processor/re-refiner, or burner who first claims that the used oil meets the fuel specifications under 3745-279-11 keep a record of each shipment of used oil to an on-spec used oil burner? [3745-279-74(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Does each record include the name and address of the facility receiving the shipment? [3745-279-74(B)(1)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
b.	Does each record include quantity of used oil fuel delivered? [3745-279-74(B)(2)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
c.	Does each record include date of shipment or delivery? [3745-279-74(B)(3)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

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	d.	Does each record include a cross-reference to the record of used oil analysis or other information used to make the determination that the used oil meets the specification as required in 3745-279-72(A)? [3745-279-74(B)(4)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
9.		Are the records described in 3745-279-74(A) and (B) maintained for at least three years? [3745-279-74(C)]	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>
10.		Before the used oil generator, transporter or processor/re-refiner directs the first shipment of off-spec used oil to a burner, does he obtain a one time written and signed notice from the burner certifying that:	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	a.	The burner has notified Ohio EPA stating the location and general description of the used oil management activities? [3745-279-75(A)(1)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
	b.	The burner will burn the off-spec used oil only in an industrial furnace or boiler identified in 3745-279-61(A)? [3745-279-75(A)(2)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>
11.		Is the certification maintained for at least three years from the date the last shipment of off-spec used oil was shipped to the burner? [3745-279-75(B)]	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input checked="" type="checkbox"/>